

Citizen Participation and Public Petitions Committee

5th Meeting, 2023 (Session 6), Wednesday
22 March 2023

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

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

Introduction

1. This is a new petition that was lodged on 1 February 2023.
2. A full summary of this petition and its aims can be found at **Annexe A**.
3. A SPICe briefing has been prepared to inform the Committee's consideration of the petition and can be found at **Annexe B**.
4. While not a formal requirement, petitioners have the option to collect signatures on their petition. On this occasion, the petitioner elected to collect this information. 1,244 signatures have been received.
5. The Committee seeks views from the Scottish Government on all new petitions before they are formally considered. A response has been received from the Scottish Government and is included at **Annexe C** of this paper.
6. A submission has been provided by the petitioner. This is included at **Annexe D**.

Action

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

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

The logo for SPICe, featuring the letters 'SPICe' in a white, sans-serif font on a dark purple background.

The Information Centre
An t-Ionad Fiosrachaidh

Briefing for the Citizen Participation and Public Petitions Committee on petition [PE1997](#): Introduce mandatory braille labelling for food products sold in Scotland, lodged by Fiona McDonald on behalf of Sight Scotland and Sight Scotland Veterans

Brief overview of issues raised by the petition

The petition is 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.'

Food labelling legislation

The majority of food labelling law which applies in Scotland originally stems from European Union legislation. After the UK's departure from the EU, the UK and Scottish Governments undertook legislative work to ensure that the existing law remained operational.

[Food Standards Scotland \(FSS\) has responsibility for the policies surrounding food labelling](#) in Scotland; however, there are certain related elements that are reserved. This includes, e.g. weights and measures and price marking. Food Standards Scotland work closely with policy officials across the UK.

While there is already some variation in food labelling policy approaches between UK nations (where divergence within individual nations was permitted through EU Directives and Regulations), there is also a history of collaboration in this policy area. For example, the UK nations

collectively launched the front-of-pack nutrition labelling scheme currently in place that uses red, amber and green to inform consumers about what they are eating.

The [Food Compositional Standards and Labelling Framework](#) sets out EU directive-derived legislation and the processes that may be used to propose new legislation in the food compositional standards and labelling standards policy area.

This common framework agreement states that collaborative working is part of the proposed approach, and the framework describes governance structures for discussing and managing the impact of any proposed policy changes made by one or more governments for the whole of the UK. A [SPICe briefing on the common framework](#) goes into detail about how this collaboration is expected to work.

Braille

Braille is a tactile reading and writing system that has been used for 200 years by blind and visually impaired people. It uses a system of 6 dots to represent alphabetic and numerical symbols and also includes musical, mathematical and scientific symbols.

It is not itself a language, rather there are versions of braille for the majority of world languages. In Scotland, the Unified English Braille (UEB) code is used.

For those who learn to use braille, it is not only used to transcribe printed communications such as books but can also be found on a variety of other items including medication, lift keypads and door signs.

Technology such as electronic braille notetakers and refreshable braille displays also enable blind and visually impaired people who know braille to browse the internet, as well as save and edit documents.

The Royal National Institute of Blind People (RNIB) undertook [a survey called My Voice](#) which asked blind and partially sighted people about their access to information. They found that nine out of ten blind and partially sighted people said that information on medication or food packaging was quite difficult or impossible to read.

The survey also showed that around seven per cent of people who are registered blind or partially sighted use braille.

Scottish Parliament Action

In May 2022, Stuart McMillan, MSP submitted a written question [S6W-08703](#) asking if the Scottish Government had considered introducing mandatory braille labelling on food products. The answer states that:

“While there is no timescale at present, in due course, the food labelling legislation will be subject to review, which is likely to be a significant task and will need to be informed by EU developments on food information. During the review process consideration will be given to which areas and policy approaches are appropriate for Scotland and in a GB context this will also include England and Wales. Policy considerations are expected to include mandatory braille labelling and/or how the use of barcoded food information and new technology could help in this area.”

Motion [S6M-07391](#) was lodged on 5 January 2023 by John Mason MSP celebrating World Braille Day, which honours the birth of Braille’s inventor, Louis Braille, who was born on 4 January 1809.

Laura Haley
Researcher
26/01/2023

The purpose of this briefing is to provide a brief overview of issues raised by the petition. SPICe research specialists are not able to discuss the content of petition briefings with petitioners or other members of the public. However, if you have any comments on any petition briefing you can email us at spice@parliament.scot. Every effort is made to ensure that the information contained in petition briefings is correct at the time of publication. Readers should be aware however that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

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Annexe C

Food Standards Scotland submission of 1 February 2023

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

Thank you for providing the opportunity to respond to this petition calling for 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.

The majority of food law which applies in Scotland stems from European Union legislation and after an extensive process to ensure that it remains operational after the UK's departure from the EU, the detail of the requirements remains in place.

Food Standards Scotland (FSS) has responsibility for the policies surrounding food composition, general food labelling and nutrition information in Scotland. The general labelling provisions, which include rules on the name of the food and when use by or best before dates are needed, are set out within the retained Food Information to Consumers Regulation 1169/2011 (FIC). In addition, The Food Information (Scotland) Regulations 2014 (as amended) cover specific national measures and enable Local Authorities to enforce the provisions in the FIC Regulation.

Whilst there is currently no mandatory provision for food information to be given in braille, food businesses can elect to do so on a voluntary basis as long as the information provided is accurate and does not mislead the consumer. We understand from earlier correspondence with Sight Scotland that one retailer currently has a policy of using braille labelling on many of their own branded goods but that other retailers have not followed suit. Sight Scotland has also mentioned that new technology could help in this respect.

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.

We are also aware of the importance of braille in conveying information to blind and partially sighted consumers.

Although no timescale was set, the intention was that the general food labelling legislation would be considered for review on a GB basis following EU exit. However, the scope of this legislation is considerable and as such any review would be a significant undertaking. In addition, other priorities mean that a full review of food labelling requirements is unlikely in the foreseeable future. In the meantime we do want to improve our understanding of blind and partially sighted consumers' needs with regard to food information and to this end we will invite Sight Scotland and Disability Equality Scotland to meet with us.

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

Annexe D

Petitioner submission of 9 March 2023

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

We thank Food Standards Scotland (FSS) for responding to the petition calling on the Scottish Government to introduce new legal requirements on retailers to provide braille labelling on food products detailing the name of the item and use by/sell by dates. We are also grateful for receiving an invitation from FSS to discuss the campaign further, with a meeting involving representatives from Oban and District Access Panel, Disability Equality Scotland and Sight Scotland taking place on 1 March 2023.

This meeting allowed campaign partners to share further insight with FSS on the importance of braille labelling as being vital for the inclusion of visually impaired people. We provided clarity on current statistics, where it was noted that there are more than 180,000 people with significant sight loss living in Scotland today. Scotland is also an ageing population so therefore the number of people living with sight loss is set to increase by 30,000 over the next 10 years. Whilst there are currently no definitive statistics around the number of braille users in Scotland, as a campaign group we are continuing to explore various avenues on collecting accurate data in this regard. We also believe that introducing braille labelling on food products would increase awareness of this inclusive format and encourage more people to learn basic braille.

As FSS stated in their submission, very few retailers have voluntarily adopted braille labelling on food packaging. As there is no statutory duty in place for food packaging this creates significant communication disadvantage for blind and partially sighted members of the public when identifying food products they wish to purchase and use. Accessible labelling is essential for reasons of safety, facilitating independent living, for storing products after a shopping expedition or when an order has been delivered, retrieving food to prepare a meal or enjoy a snack and participating in shopping with sighted assistance.

If a safety risk assessment was carried out on an unsupervised person preparing food and if the products that were being used had no labels on the packaging, the risk would be considered to be extremely high.

During discussions with FSS, campaign partners also reflected on advances in technology. Some retailers have trialed the use of QR codes and barcoded food information. This technology allows an individual to have the ingredients, allergen and recycling information read aloud to them. A key principle of the concept of inclusive communication is the acknowledgment that individuals use a variety of ways to receive and understand communication and to express themselves. Therefore, it is important to offer a variety of accessible formats that match individuals' requirements, support needs and preferences. With this in mind, technology provides many solutions, but it can also create problems with high costs, reliability and sustainability. As such, it should never be considered to be a substitute for braille.

FSS shared that they are considering conducting a public consultation exercise that would involve a variety of stakeholders such as consumers, businesses, industry bodies, and local authorities to provide further insight on the impact of mandatory braille labelling for food products sold in Scotland. As a campaign group, we are extremely encouraged by the prospect of a public consultation, and we would ask that this is taken forward by FSS with reasonable timescales. We also strongly recommend that a public consultation is conducted in an inclusive manner, with documents available in a variety of accessible formats, such as braille, Easy Read, large print and plain text.

We once again thank FSS for their response to the petition and we welcome any further engagement in progressing the core aim of the campaign.