

# 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.