

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.