

Food Standards Scotland submission of 12 May 2023

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

Thank you for your letter of the 18th of April 2023 and for the opportunity to provide an update on any plans to conduct a public consultation on mandatory braille labelling for food products sold in Scotland and the indicative timescale for this.

The office of the Director-General for Health and Social Care at the Scottish Government has also been in touch following receipt of your letter of the 18th of April 2023 seeking information on what discussions have taken place to review general food labelling on a UK-wide basis and who in the UK Government is leading on this matter.

As Food Standards Scotland (FSS) has responsibility for the policies surrounding food composition, general food labelling and nutrition information in Scotland, please treat this letter as a response to both pieces of correspondence.

As the public body with policy responsibility for general food labelling FSS understands how important food information is to consumers and we are open to exploring what may be possible to support blind and partially sighted consumers.

We had a useful meeting with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland on the 1st of March 2023, and the information received 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. While FSS has no immediate plans to conduct a public consultation on policy options for the introduction of mandatory braille labelling on food products in Scotland, we will seek to build further evidence and knowledge to support developing potential options in this area, which may include a public consultation in due course. However, we are unable to give a timescale for this or a guarantee of changing food labelling requirements at present.

FSS will however consider all the points raised, including what additional research and engagement with industry trade bodies and consumers may be needed.

The Committee will also be aware that any proposed changes to legal food labelling requirements need to be considered on a UK-basis, under the UK Food Compositional Standards and Labelling Common Framework. As such, we have brought the braille labelling petition to the attention of labelling policy officials in the Department for Environment, Food and Rural Affairs (Defra) and the Food Standards Agency (FSA) in Wales and Northern Ireland, and we will continue to seek to progress this issue on a four-nation basis.

We will also continue to engage with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland to provide an update on any progress.

However, given the demands on FSS and other lead government departments as a consequence of work arising from the UK Government's Retained EU Law Bill and other commitments on labelling and standards matters, progress on braille labelling work is unlikely to be possible in the short term.

With regards your letter to the office of the Director-General for Health and Social Care, I can confirm that Defra are the lead UK Government department with policy responsibility for food labelling. While no specific timescale had been set to review general food labelling on a UK-wide basis, we understand that it had been the intention of the UK Government to undertake such a review following EU exit. However, Defra has instead opted to focus on a limited number of specific areas for review instead of a complete overhaul of food labelling, including precautionary allergen labelling (may contain statements), environmental information and animal welfare information. As such, we are not expecting the UK Government to press for a full review of the general food labelling requirements in the near term.

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