

Petitioner submission of 3 November 2023

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

We would like to take this opportunity to provide the Committee with further information to aid with their consideration of our petition.

In August 2023, our campaign group launched a survey to get feedback from individuals on the general accessibility of food packaging, including braille. The results from this survey portray an outstanding need for food package labels to be more accessible.

76% of respondents saying that current labels do not meet respective accessibility requirements

Braille users who responded to the survey highlighted the importance of introducing legislation which will make braille labels on food products mandatory. Respondents highlighted challenges they face in their daily lives when identifying food products in their homes. A key point to note is that respondents highlighted how braille would improve the safety of people with visual impairment, allowing them to identify which products are safe to consume.

“I read braille, and this is simply a no-brainer. It would improve inclusivity and help food manufacturers to reach a wider audience.”

The survey highlighted something that we are told frequently: food labels are inaccessible and difficult to read. This is due to text being too small, poor colour contrast, and inconsistent design. We note that food labels contain vital information – not just best before and use by dates, allergen, and nutritional information. It can be argued that braille labelling is in fact most useful when retrieving and storing food items so that a person can easily identify a product instantly. In the current cost-of-living crisis, this is especially important to reduce food waste if a product is opened accidentally.

Assistive technology, including QR codes and apps, such as NaviLens, were also mentioned in responses as helpful forms of technology that can improve accessibility possibilities. It was noted, however, that assistive technology should be seen to complement and not be a substitute for braille or other accessible formats.

Various barriers such as financial constraints and devices which lack the necessary accessibility features to use QR codes were also highlighted. In 2022, [The European Commission](#) launched a review into accessible labelling whereby it was pinpointed that the use of only digital means to provide food information, such as QR codes, apps, and website links, isolates people without internet access, or without digital skills. The European Commission concluded that braille information is essential alongside digital sources to be truly accessible for all people with visual impairment.

We argue therefore, again, that digital information sources need to be used alongside braille. We're calling on you to take into account the findings we've shared from both the European Commission's report and the survey we conducted when considering our petition. Food Standards Scotland stated in correspondence with us that they will seek to build evidence and knowledge in this area and, in the future, may run a public consultation to gather further views on braille labelling on food products in Scotland. We call on you to encourage this consultation, and to bring it forward.

Braille labelling on pharmaceutical products, which was implemented a number of years ago, has provided enormous benefits and augmented the very important issue of safety for visually impaired people; we are passionate and committed that this statutory requirement should be extended to food products.

We trust the Committee finds this information useful when considering our petition and would be happy to share our report about accessing labelling if of interest.

With many thanks for your attention to this,

Sight Scotland and Sight Scotland Veterans

Disability Equality Scotland

Oban and District Access Panel