Food Standards Scotland submission of 20 December 2023

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

Thank you for your letter of the 24 November 2023 and for the opportunity to provide an update on our work to build an evidence base.

As you are aware we had a useful meeting with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland earlier in the year, which 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. Since this time, we have had some follow up communication with Sight Scotland, including the report from their recent Braille and Accessible Food Labelling Survey.

We have also had initial discussion with internal social science and research colleagues, and we are looking to use all available relevant science, evidence and research to inform our thinking on the matter including the European Commission's review into accessible labelling as highlighted by the Committee. We are also continuing to develop our thinking around stakeholder engagement. The next step would be to seek views from those businesses or organisations representing businesses with experience in providing information in braille on their food and/or non-food products.

FSS acknowledges the importance of food information to all consumers. While it remains the case that due to current workloads no timescale can be set at the moment, our intention is to continue to work towards building further evidence and knowledge on the practicalities and costs to help develop potential options in respect of braille food labelling. We note the Committee's recommendation to consult, and consultation would be an important part of developing any proposals. We will continue to discuss this on a UK basis with the Department for Environment, Food and Rural Affairs (Defra) and the Food Standards Agency (FSA) in Wales and Northern Ireland as we are required to under the UK Food Compositional Standards and Labelling Common Framework.

Going forward, we will continue to keep in touch with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland as our plans develop.

I hope the Committee finds this response helpful.