Food and Drink Federation Scotland submission of 17 May 2023

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

Thank you for the opportunity to comment on the above petition.

The Food and Drink Federation is not aware of any industry analysis that has been conducted to investigate the cost and feasibility of introducing braille to food packaging.

The Committee may be interested in alternative technologies being trialled by food producers that are inclusive to non-braille sight loss and other groups who may struggle to read current labels which provide a wide range of information in different formats including large/accessible print and audio such as Navilens. (Please see attached case study below from Kelloggs UK)

The FDF encourages all UK authorities to recognise digital food information as a complementary means to both: repeat mandatory product information (e.g. in a more accessible digital format for certain consumers, such as larger font size, different language, or audio labels for blind and partially sighted people) and to provide additional voluntary product information. As consumer labelling policy develops, the regulatory framework UK should be adapted accordingly to reflect the core principles relating to the provision of digital food information, which in turn would also help reduce packaging volumes and wastage and mitigate some of the costs borne by the food industry when labels need updating.

If the committee would like further information, please do let me know.

Attachment –

KELLOGG'S TO ROLL OUT CEREAL BOXES WITH WORLD-FIRST TECHNOLOGY FOR BLIND AND PARTIALLY SIGHTED

- **All Kellogg's cereal boxes to be adapted following a successful trial**
- **The new code on its packaging will allow a smartphone to detect and playback labelling and allergen information to the user**

Kellogg's is today announcing that following a successful trial, new world-first technology will be permanently added to all of its cereal boxes to make them accessible to blind and partially sighted people.

Important information on food packaging, such as allergen details can often be in print that's difficult for blind or partially sighted people to read. The new boxes will allow a smartphone to easily detect a unique on-pack code and playback labelling information to the shopper with sight loss.

The company will change all its cereal packaging, beginning in 2022 with the first accessible boxes of Special K appearing on shelf in January. The idea came to life when Kellogg's met with children from St Vincent's in 2019, a specialist school in Liverpool for children with sensory impairment. It was the pupil's insight that inspired the business to look for solutions.

Kellogg's also hopes that by sharing its experience with other brands there is an opportunity to make the supermarket shelves more accessible for people with sight loss so they can shop more independently and access information from a range of packaging.

This announcement comes after a successful UK trial last year in partnership with Co-op, on Kellogg's Coco Pops boxes. Evaluation of the

pilot by charity Royal National Institute of Blind People (RNIB) showed that 97 percent of the participants agreed that they would like to see more of these accessibility features available on grocery packaging in the future.

Unlike other types of printed codes, the new technology, called NaviLens, includes high contrasting coloured squares on a black background. Users do not need to know exactly where the code is located to scan it.

It allows smartphones* to pick up the on-pack code from up to three metres distance when a blind or partially sighted shopper points their device in the direction of the cereal box. This then alerts the phone and the shopper can choose to have the ingredients, allergen and recycling information read aloud to them – as well as reading it on their device using accessibility tools.

The technology is currently used across Barcelona, Madrid and Murcia city's transport systems, making the cities easier to navigate for thousands of visually impaired citizens.

Chris Silcock, head of Kellogg's UK, said: "Over two million people in the UK live with sight loss** and are unable to simply read the information on our cereal boxes. As a company focused on equity, diversity and inclusion we believe that everyone should be able to access important and useful information about the food that we sell.

"That's why, starting next year, we are adding new technology to all of our cereal boxes. I am proud that Kellogg's will be the first company in the world to use NaviLens on packaging. We know it's important that all packaging is accessible for the blind community to enable them to make

shopping easier, so we will share our experience with other brands who want to learn more."

Javier Pita, CEO of NaviLens, the start-up company that created the technology commented: "The incorporation of the NaviLens codes onto food packaging is a positive step towards a more inclusive and accessible shopping experience for the visually impaired. This allows people with sight loss to shop more independently and make their own food choices."

Marc Powell, strategic accessibility lead at RNIB, said: "This announcement from Kellogg's is a real game changer within the packaging world. It marks a significant step-change in how big brands can put accessibility at the forefront of design and packaging decisions and be a catalyst for change.

"Important information on packaging can often be in very small print, making it difficult or impossible for people with sight loss to read. Changes like this can provide blind and partially sighted people with vital information for the very first time, giving us the same freedom, independence and choice as sighted customers.

"Designing packaging so that it works for everyone makes complete sense and we hope that other brands will follow Kellogg's lead in making packaging information more accessible."

Notes to Editor:

*Using the free NaviLens App

**According to the NHS

About NaviLens

NaviLens is a printed code that can be scanned, using a smartphone camera and a free app, to hear what information is stored within them. The tags are made up of high-contrasting coloured squares on a black background, similar in appearance to a QR code. Unlike with QR codes, users don't need to know exactly where a tag is to be able to read it. A tag measuring 20 x 20 centimetres (7.9 x 7.9 inches) can be detected from 12 meters (40 feet) away, even in motion and without having to focus the phone's camera.

As users sweep their environment with a smartphone, audio cues allow them to find and centre the tag in the phone's field of view. A shake of the wrist prompts the details contained within the tag to be read out. The information can vary depending on where the user is standing in relation to the tag, and can be programmed in multiple languages, with the phone automatically selecting its native language.

NaviLens is created by Neosistec, in collaboration with the Mobile Vision Research Lab at the University of Alicante.