

# **PE1997/I: Introduce mandatory braille labelling for food products sold in Scotland**

## **Petitioner written submission, 2 April 2024**

We note in [DEFRA's submission of 7 March 2024](#) that "*the UK maintains high standards on the information that is provided on food labels, whether that be mandatory or voluntary, so that consumers can have confidence in the food that they buy*" and "*it is already a requirement that food information must be easily visible, clearly legible, and where appropriate indelible, in addition to there being a required minimum font size for mandatory information.*"

We are concerned that current practices fall short of these standards, given the difficulties blind and partially sighted people are experiencing when trying to identify items and their ingredient information. We would be grateful if DEFRA could advise what the minimum font size for mandatory information currently is? How is this monitored to ensure compliance? What are the consequences on retailers and manufacturers if they don't meet these standards?

We are eager to highlight the European Commission's review into accessible labelling found that assistive technology, including QR codes and apps can improve accessibility possibilities, however, that assistive technology should be seen to complement and not be a substitute for braille or other accessible formats. It is our view that digital means alone are not sufficient to guarantee the accessibility of food information to visually impaired individuals. This is evidenced in the legislation to require the pharmaceutical industry to provide braille on medicinal products. Indeed, the issue of braille labelling on food items could have been addressed at the same time.

We believe it would be prudent for DEFRA to conduct a public consultation on the introduction of braille labelling to gather views from both consumers and retailers and manufacturers. If the practical viability of braille labelling and the costs associated must be considered before a consultation is launched, then we strongly urge DEFRA to undertake this research.

The Committee may wish to note we are due to meet with Food Standards Scotland in the near future and will be raising these points, including the suggestion for a public consultation, with them too.

With many thanks for your attention to this.