# **Food Standards Scotland Strategy 2026-31 Consultation Response Braille Food Labelling Campaign Coalition**

# **Introduction**

**Organisation:** Braille Food Labelling Campaign (Sight Scotland, Sight Scotland Veterans, Disability Equality Scotland, Oban and District Access Panel)
**Respondent:** Joanna Zawadzka, Campaigns and External Affairs Officer at Sight Scotland and Sight Scotland Veterans joanna.zawadzka@sightscotland.org.uk

# **Vision and Values**

# **Question 4: Our vision is to have a ‘safe, authentic and healthier food environment that Scotland can trust’. What are your views on whether this strategy will help to achieve this? (See page 8 of the document)**

We strongly support FSS's vision of a 'safe, authentic and healthier food environment that Scotland can trust' and see meaningful opportunities to strengthen the delivery of this vision through leadership on accessible labelling and food information issues that advances both population health and equality goals.

Strong leadership on accessible labelling and food information connects directly to [Scotland's Population Health Priorities](https://www.gov.scot/publications/scotlands-public-health-priorities/%5D) and the Good Food Nation Act addresses the issues faced by over 180,000 vision impaired people in Scotland who may be unable to participate fully in the healthy food choices essential to achieving these goals. With the number of visually impaired people projected to increase by 30,000 over the next decade due to population ageing, this represents a growing challenge that deserves FSS's attention.

FSS's own data shows foodborne disease costs Scotland £729 million annually. Vision impaired people may face heightened risks due to inability to always fully access safety information, contributing to both individual harm and these population costs. Our evidence demonstrates that 76% of vision impaired people cannot read current labels, creating difficult choices between independence and safety. This particularly affects Braille users across all ages - students, parents, professionals, and children who rely on Braille for literacy and independence.

Braille matters fundamentally for population health because it enables independent identification of food products, expiry dates, and key allergen warnings - essential information for safe consumption. This supports diabetes management by allowing people to verify product types and check use-by dates, prevents allergic reactions through direct access to allergen alerts, and promotes food safety by enabling independent checking of freshness. Beyond these immediate health benefits, braille maintains independence by enabling active participation in food shopping and preserves dignity through private food choices without requiring assistance to identify basic product information.

Moreover, there's also an important connection to preserving braille literacy itself. Without everyday applications like food labelling, young vision impaired people have fewer reasons to learn this valuable tool that enables education, employment, and independence. Visually impaired people’s organisations are also concerned about losing fundamental literacy capabilities if braille's presence in daily life continues to decline.

## **Question 5: Do you agree or disagree that the values outlined in the strategy fully reflect what will be required from us to fulfil our consumer protection and regulatory functions between 2026-31? (See page 7 of the document)**

**Partially agree - values need explicit commitment to excellence in accessible labelling and food information**

We support FSS's values but suggest strengthening them through explicit leadership on accessible labelling and food information. FSS's commitment to being "consumer and health focussed" should naturally include all consumers, including those with visual impairments, whilst "evidence based" aligns with our research showing clear accessibility barriers in labelling and food information.

Scotland has consistently led the way on public health across the UK. Scotland introduced smoking bans and minimum unit pricing without waiting for consensus elsewhere, proving that bold action drives real change. FSS could take the same approach with on accessible labelling and food information, promoting voluntary adoption of accessible food labelling while building evidence for future policy.

Just as inaccessible public buildings without wheelchair access or stations without audio announcements would no longer be seen as acceptable, food deserves the same commitment to universal access. In a similar fashion we should ensure basic food details like product names, expiry dates and allergen warnings are accessible to everyone who needs them. Scotland therefore has opportunity to lead on inclusive food packaging and labelling, just as Scotland has done with other public health issues. We already provide safety information in multiple formats during medical appointments - why not ensure basic food details are accessible to everyone who needs them?

We particularly appreciate FSS's commitment to being "inclusive, collaborative and open," which creates opportunities to champion excellence in accessible labelling and food information alongside other quality markers.

## **Strategic Priorities**

## **Question 6: Do you agree that the strategic priorities FSS has proposed to target in this strategy are the right ones for us to focus on over the next five years? (See page 9-12) of the document)**

**Support with essential enhancements for health equity**

We support these priorities and see accessible labelling and food information as an important enabler, with opportunities for collaboration that could strengthen FSS's overall impact.

Current labelling systems create avoidable risks for vision impaired people, including allergen exposure, foodborne illness from inability to read safety information, and diet-related illness from information barriers. The [RNIB has found that 90% of vision impaired people](https://www.rnib.org.uk/campaign-with-us/everyone-should-have-the-right-to-know-what-theyre-buying/#:~:text=Nine%20in%2010%20people%20with,family)%20may%20be%20allergic%20to.) find medication or food label information difficult or impossible to read, with serious consequences for those with allergies or dietary requirements.

Vision impaired people experience twice the rates of diabetes and obesity, conditions FSS works to prevent through informed food choices. Our survey shows 68% experience stress when food shopping, affecting mental wellbeing and often leading to reliance on processed foods over fresh options they cannot safely assess.

## **Question 7: Of the strategic priorities presented, which one do you think should be the highest priority for FSS over the next 5 years, and why?**

Public health and consumer protection should be the highest priority, with on accessible labelling and food information as an essential component. FSS cannot fully achieve consumer protection whilst a significant number of visually impaired consumers lack access to essential safety information.

The pharmaceutical sector demonstrates successful implementation of braille labelling. Since EU regulations mandated braille on medicines, medication errors decreased, and independence increased. Industry adapted successfully, leading to what the European Blind Union describes as "increased security, safety and independence." Similar benefits would apply to food products.

International evidence supports this approach. [Chile's accessible labelling reforms](https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1003015) achieved 23.7% reductions in unhealthy food purchases, demonstrating population-wide benefits when information systems work for everyone.

## **Question 8: Do you agree that our proposed actions to deliver on our priority of public health and consumer protection will be sufficient to achieve our objective of a safe and healthy food environment that protects people of Scotland from foodborne illnesses and the impacts of poor diet?**

**Partially agree - needs concrete commitments on accessible labelling and food information**

We welcome FSS's commitment to "clear, accessible communications" but suggest specific improvements FSS could promote:

**Information standardisation** - promoting consistent placement of key details like allergens would help assistive technology users immediately. Recognition of **voluntary excellence in accessible labelling and food information recognition** - celebrating businesses like the Co-op Group (using braille since 2001) and Paterson's shortbread to inspire wider adoption. **Digital accessibility improvements** - supporting QR codes and apps whilst recognising these complement rather than replace tactile information.

The European Commission's 2022 accessibility review concluded that digital approaches alone cannot guarantee access due to connectivity issues and device costs. Multiple approaches work best together.

Research shows accessibility investments typically deliver strong returns - Forrester Research indicates £100 return per £1 invested, whilst studies demonstrate that vision impaired people with braille skills have employment rates of 56% versus 23% for those without.

## **Question 9: Do you agree that our proposed actions to deliver on our priority of reforming and evolving the regulatory landscape will be sufficient to achieve our objective to promote a regulatory and enforcement framework which is efficient and effective in strengthening compliance and public trust in Scotland’s food system? (Page 10-11)**

We support progress and leadership within existing constraints and Scotland has often taken innovative approaches, and FSS could do similar work for accessible labelling and food information.

FSS could promote voluntary guidelines drawing on pharmaceutical sector expertise in accessible labelling and food information, promote and celebrate leadership in accessible labelling and food information, best practice sharing between businesses, and evidence-building through supported pilot programs. We note FSS received funding from Scottish Government's £30 million "invest to save" program for innovation, and improvements in accessible labelling and food information offer efficiency benefits by reducing support needs and enabling independence.

International progress is encouraging. Spain has enacted Law 4/2022 mandating braille labelling on packaged foods and hazardous products. While approximately 30 countries currently require braille on pharmaceutical packaging, momentum toward broader accessibility requirements is growing. We would encourage FSS to position Scotland as a leader in this developing area.

## **Question 10: Do you agree that our proposed actions to deliver on our priority of providing an effective public service for the people of Scotland will be sufficient to achieve our objective to ensure the services we deliver are effective, efficient, inclusive and sustainable? (Page 11-12)**

We agree that effective service provision requires universal access. FSS's digital innovation commitments create opportunities for development of accessible labelling and food information. We support technological advancement whilst advocating for a diverse range of accessibility approaches because not everyone can use technology equally effectively, and multiple options ensure genuine choice.

True effectiveness means universal service across all age groups and circumstances - from young parents to students to professionals to older people seeking to maintain independence.

## **Working in Partnership**

## **Question 11: Do you agree or disagree that the strategy fully reflects FSS’ plans to work in partnership with industry, local authorities and government to deliver this strategy effectively?**

We enthusiastically support FSS's partnership approach and offer established expertise including direct user connections with vision impaired people across all circumstances, business relationships with pioneers in accessible labelling and food information and willing adopters of accessibility, international expertise through European Blind Union connections and global best practice, evidence capabilities through ongoing research, and technical knowledge through Scottish Braille Press's 125 years of implementation expertise.

## **Question 12: What partnerships will be particularly important in achieving FSS’s vision and priorities?**

Essential collaborations include user expertise organisations such as Sight Scotland bringing lived experience to policy development, businesses with a commitment to inclusion like the Co-op Group, Paterson's Shortbread, and Arran Whisky which demonstrate the feasibility of accessible labelling and food information, Public Health Scotland for connecting accessibility to population health outcomes, international networks through European Blind Union sharing global innovation, technology developers like Be My Eyes and NaviLens improving digital accessibility, and research institutions building evidence base for voluntary approaches.

## **Question 13: How can FSS strengthen its engagement with people like you over the life of this strategy?**

We suggest collaborative approaches including co-design sessions with vision impaired consumers informing FSS policy, accessible labelling and food information excellence awards recognizing business leadership, best practice sharing events connecting willing adopters with expertise, regular progress reviews tracking voluntary adoption and impact, and international learning exchanges bringing global innovation to Scotland.

**Meeting Challenges and Issues**

## **Question 14: Are there any other external factors, that we have not referenced in the strategy, that you think will impact on our ability to deliver this strategy? (See page 14 of the strategy document)**

**Consumer protection and food safety:** Vision impaired consumers currently face heightened risks from foodborne illness because they cannot access essential safety information like use-by dates, storage instructions, and allergen warnings. This creates avoidable health risks and contributes to the £729 million annual cost of foodborne disease in Scotland that FSS works to reduce. Without everyday applications like food labelling, braille literacy skills decline, leaving fewer people able to access any written safety information independently.

**Supporting Scotland's population health priorities:** The Scottish Government's 10-year Population Health Framework emphasises prevention and reducing inequalities. When vision impaired people cannot access nutritional information, they're excluded from the dietary improvements that FSS promotes. This contributes to their doubled rates of diabetes and obesity - conditions that cost Scotland's health system significantly. Food labelling provides essential daily literacy practice that maintains people's ability to access health information throughout their lives.

**Meeting regulatory best practice standards:** International momentum is building as the EU strengthens accessibility requirements through the European Accessibility Act, and countries like Spain mandate braille on food packaging. The pharmaceutical sector has successfully required braille since 2010 with no significant compliance issues. Food labelling represents a logical extension of existing accessibility requirements that ensures consumer information remains accessible to all users.

## **Question 15: To what extent do you feel the strategy reflects the need for FSS to be agile and responsive to future changes, e.g. new risks, policies, or technologies?**

We support FSS's adaptive approach and offer partnership in testing quick wins on accessible labelling and food information within current powers, building evidence through pilot projects, learning from international best practice, and supporting voluntary adoption through recognition and promotion.

The successful implementation and delivery of Braille labelling is demonstrated through effective implementation by pharmaceutical product manufacturers, it’s adoption by the Co-op Group, and international implementation. Areas for immediate progress include voluntary guidelines development, recognition schemes, evidence-building acceleration, and innovation pilots with willing partners.

## **Additional Comments**

## **Question 16: We welcome any further comments about the strategy, including any gaps you have identified**

**Transformative opportunities for inclusive leadership**

Practical improvements FSS could promote include standardised information placement through consistency guidelines, recognition of voluntary accessible labelling and food information excellence and digital innovation partnerships ensuring FSS's technological development serves all users.

**Multiple peer-reviewed studies show that vision impaired people with braille skills have significantly higher employment rates.** By supporting everyday applications of braille like food labelling, FSS would contribute to broader social inclusion and economic participation.

Market evidence shows demand exists. [Canadian chocolatier Purdy’s](https://www.cbc.ca/news/business/braille-boxes-accessible-packaging-1.6296659) found their braille-labelled holiday products sold out within hours online when launched in December 2021. Companies implementing accessible packaging report it creates "societal impact" and expands market reach.

Research shows accessibility investments typically deliver strong returns - Forrester Research indicates £100 return per £1 invested - whilst companies like Purdy's demonstrate market demand for accessible packaging.

Scotland has opportunities for leadership in accessible labelling and food information. FSS could develop leading voluntary accessible labelling and food information standards inspiring wider adoption across the UK, create accessible labelling and food information excellence recognition driving innovation, and position Scotland as an international accessible labelling and food information leader.

**The dignity and independence imperative**

As Marie Harrower from Oban and District Access Panel reflects: "Perhaps the most effective answer is to imagine for a few minutes not having a print label on a food product or, with great care to test the practicality of storing or retrieving food products with closed eyes. In 2025 surely being unable to identify food products should not be an issue that still requires to be addressed."

This simple exercise reveals the daily reality for vision impaired people who face fundamental challenges around safety when storing and retrieving food products they cannot identify.

But beyond the practical safety concerns lies something equally important, as Jim Tolmie from Oban and District Access Panel explains: "How important for our self-esteem and mental wellbeing is being able to undertake something safely and independently? The gains that could be achieved for a person with poor or no sight by having braille incorporated into food products would open up a whole spectrum of currently restricted achievements in routine domestic life for a great number of people. "The fundamental question is straightforward: Should food safety information be available to everyone who needs it? We believe the answer is yes.

Visual impairment organisations offer partnership in making this a reality through practical, cost-effective approaches that advance FSS's broader strategic goals.

As one vision impaired person noted: "Every day I wake up to a sighted world that isn't made for me." Equal access to information enables basic independence, since food shopping is a fundamental life activity. Intergenerational considerations are important too.

Today's young vision impaired people need practical reasons to learn braille. Without everyday applications like food labels, this vital literacy skill becomes less relevant. Food labelling isn't just about current convenience but about preserving literacy tools for future generations.

## **Conclusion**

## **Question 17: Follow-up**

Yes, please provide updates in accessible formats.

**Campaign Resources:**

* Petition: https://www.parliament.scot/get-involved/petitions/view-petitions/pe1997
* FSS Strategy 2026-31: https://www.foodstandards.gov.scot/publications-and-research/publications/fss-strategy-2026-31-draft
* Chile labelling study: Taillie LS, Reyes M, Colchero MA, et al. PLOS Medicine. 2020;17(2):e1003015. https://doi.org/10.1371/journal.pmed.1003015
* Mental health research: Virgili G, et al. Systematic review and meta-analysis. *J Clin Med*. 2022;11(2):393. https://doi.org/10.3390/jcm11020393
* Suicidal ideation research: Kim Y, et al. Association between visual impairment and suicidal behaviors. *JAMA Network Open*. 2024;7(3):e243020. https://doi.org/10.1001/jamanetworkopen.2024.3020
* Employment research: McDonnall MC, et al. Braille reading and employment outcomes. *Journal of Visual Impairment & Blindness*. 2025;119(2):97-108. https://doi.org/10.1177/0145482X241295396; Ryles R. The impact of braille reading skills on employment outcomes. *Journal of Visual Impairment & Blindness*. 1996;90(3):219-226
* Spain legislation: Law 4/2022 of February 25, 2022 (BOE-A-2022-3147). Spanish Ministry of Social Rights EU notification, June 20, 2025
* Purdys success: CBC News. Canadian company builds a better box of chocolates using braille. December 25, 2021. https://www.cbc.ca/news/business/braille-boxes-accessible-packaging-1.6296659
* RNIB statistics: https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics-on-sight-loss-in-the-uk/
* European Commission accessibility review (2022): https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12611-Revision-of-EU-rules-on-the-provision-of-food-information-to-consumers\_en
* Pharmaceutical braille legislation: EU Directive 2004/27/EC. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32004L0027
* Accessibility ROI research: Forrester Research (2022), cited in: https://makeitfable.com/article/roi-of-investing-in-digital-accessibility-and-usability/

We look forward to transformative collaboration with FSS to ensure Scotland leads in creating food systems that serve everyone's health, safety, and dignity.

## **End of document**