



The Bar Council

## Law reform essay competition 2025: runner up – Jessikah Inaba

### Feeling Beyond the Box: A Braille-Centric Proposal For UK-EU Labelling Reform

#### Introduction

Consumers are entitled, as a matter of legal and ethical principle, to be provided with clear, comprehensive information regarding a product's nature, composition, and the appropriate measures for its safe and effective use. Contemporary regulatory frameworks across the United Kingdom (UK) and the European Union (EU) impose strict obligations on manufacturers to provide vital information such as ingredient lists, allergen disclosures, usage instructions, safety precautions, and expiration data, thereby preventing consumer harm and promoting autonomous, informed choices<sup>123</sup>. However, blind Braille users remain excluded from independently accessing information routinely available to sighted consumers. Exclusively visual labelling entrenches informational inequality, depriving blind consumers of the same critical safety and usage knowledge readily available to their sighted counterparts.

The central argument advanced in this essay is that in order to fulfil the rights of blind consumers to information and safety, legislative reform of UK and EU labelling laws is required to mandate the inclusion of accessible formats such as Braille on all levels of product packaging, beyond the current minimal standards applied to outer medicine boxes. Through an assessment of existing legislation and its deficiencies, this essay invokes foundational equality and disability rights standards (including Osman v DWP (2023) and other case law) and considers recent reforms such as "Natasha's Law" on allergen labelling to underscore the urgent need for pre-emptive legislative action. The incorporation of Braille across all product labelling is not a luxury or an act of benevolence, but a legal imperative necessary to ensure that blind persons enjoy equal autonomy and protection under the law. This gap is in need of urgent

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<sup>1</sup> Regulation (EU) No 1169/2011 on the provision of food information to consumers [2011] OJ L304/18. Available at: <https://www.legislation.gov.uk/eur/2011/1169/contents> (accessed 25 August 2025)

<sup>2</sup> Regulation (EC) No 1223/2009 on cosmetic products [2009] OJ L342/59 (consolidated). Available at: <https://eur-lex.europa.eu/eli/reg/2009/1223/eng> (accessed 21 August 2025)

<sup>3</sup> Directive 2001/83/EC (as amended by Directive 2004/27/EC) on medicinal products for human use (including art 56a on Braille). Available at: <https://eur-lex.europa.eu/eli/dir/2001/83/oj/eng> (accessed 29 August 2025)

reform, before an otherwise preventable incident compels it.

## The Legal Purpose of Labelling

Product labelling is governed by comprehensive legal standards designed to ensure accuracy, clarity, accessibility, and protection. As an illustration, pharmaceutical labelling and accompanying leaflets must disclose active ingredients, excipients (with major allergens in bold), dosage guidelines, methods of administration, and any specific cautionary notices (e.g. contraindications in pregnancy or effects on driving)<sup>4</sup>. In compliance with food safety regulations, product packaging must disclose ingredients (according to International Nomenclature), highlight allergens, nutritional values, "use by" or expiry dates, and storage and preparation instructions. Cosmetics labels also list their contents, as well as any special warnings (such as avoiding eye contact).

The legal mandate to include such information serves a clear protective function; to safeguard consumers from harm by promoting the correct therapeutic use of medicines and averting adverse outcomes such as allergic reactions and product misuse. In circumstances where a sighted individual disregards a conspicuous warning such as "Contains: Peanuts" on a packaged food product or fails to see a "Do not take with alcohol" caution on a pharmaceutical label, prevailing legal doctrine generally interprets the manufacturer's duty of disclosure as fulfilled, transferring onus to the consumer to read and heed the information. But what about when the consumer cannot read the label at all due to blindness?

Blind and partially sighted people have an equivalent, if not heightened entitlement to precise safety and usage information, owing to the fact that visual cues such as appearance or condition cannot reliably inform their assessment of identity, quality, or freshness. For Braille users, print-only labels nullify the protective purpose of labelling laws.<sup>5</sup> In forums, visually impaired people frequently highlight the barrier to obtaining food label information that sighted consumers use effortlessly.<sup>6</sup> Those with comorbid diabetes report a particularly acute disadvantage as the absence of accessible carbohydrate content on product labels directly impedes their capacity to

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<sup>4</sup> Human Medicines Regulations 2012 (UK), SI 2012/1916. Available at: <https://www.legislation.gov.uk/uksi/2012/1916/contents> (accessed 27 August 2025)

<sup>5</sup> Department of Health (England), Making written information easier to understand for people with sight problems (2006). Available at: [https://assets.publishing.service.gov.uk/media/5a74adb4e5274a56317a6411/dh\\_121927.pdf](https://assets.publishing.service.gov.uk/media/5a74adb4e5274a56317a6411/dh_121927.pdf) (access ed 21 August 2025)

<sup>6</sup> European Commission, Study on Braille Labelling of Medicinal Products (2007). Available at: <https://ec.europa.eu/health> (accessed 28 August 2025)

<sup>7</sup> Equality and Human Rights Commission (EHRC), Being Disabled in Britain: A Journey Less Equal (2017). Available at: <https://www.equalityhumanrights.com/sites/default/files/being-disabled-in-britain.pdf> (accessed 30 August 2025)

regulate insulin with the necessary precision.<sup>8</sup> This echoes broader accessibility concerns where exclusion from essential information denies individuals vital safety details, but also the fundamental dignity linked to performing quotidian routines independently.

The right of blind persons to access information is progressively acknowledged as a matter of equality.<sup>9</sup> Pursuant to the UK's Equality Act 2010, businesses and service providers are under a statutory obligation to implement "reasonable adjustments" for disabled people, including those with visual impairments, in order to avert disproportionate disadvantage.<sup>10</sup> In relation to consumer goods, this obligation logically entails providing label information in an accessible format (such as Braille or audio) so that blind customers are not left in the dark about information immediately apparent to sighted customers. The Department of Health itself concedes that product labels are often printed in diminutive font or with poor contrast, factors that impede legibility for people with partial sight and a fortiori, preclude access altogether for Braille-dependent consumers.<sup>11</sup> A failure to address this requirement runs contrary to the principle of equal access.<sup>12</sup>

According to the European Blind Union, Europe is home to in excess of 30 million blind or partially sighted people, of whom over 2 million reside in the UK.<sup>13</sup> The Royal National Institute for the Blind (RNIB) reports that an estimated 7-8% of registered blind people utilise Braille, equating to roughly 20-30,000 individuals who rely on Braille as a literacy medium in the UK.<sup>14</sup> These individuals possess an equal right to independently access the information that regulators deem important enough to mandate on a label. In essence, the current framework, which makes product information available in a form unintelligible to blind individuals, amounts to unacceptable exclusion and necessitates legislative reform.

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<sup>8</sup> RNIB, My Voice 2015 – UK experiences of blind/partially sighted people (packaging access). Available at: <https://www.rnib.org.uk/professionals/research-and-insight/reports-and-insight/my-voice/> (accessed 27 August 2025)

<sup>9</sup> European Commission, Guideline on the readability of the labelling and package leaflet of medicinal products for human use (2009). Available at: [https://health.ec.europa.eu/system/files/2016-11/2009\\_01\\_12\\_readability\\_guideline\\_final\\_en\\_0.pdf](https://health.ec.europa.eu/system/files/2016-11/2009_01_12_readability_guideline_final_en_0.pdf) (accessed 10 August 2025)

<sup>10</sup> Equality Act 2010 (UK), c 15 (including ss 20–21). Available at:

<https://www.legislation.gov.uk/ukpga/2010/15> (accessed 22 August 2025)

<sup>11</sup> Department of Health (England), Making written information easier to understand for people with sight problems (2006). Available at:

[https://assets.publishing.service.gov.uk/media/5a74adb4e5274a56317a6411/dh\\_121927.pdf](https://assets.publishing.service.gov.uk/media/5a74adb4e5274a56317a6411/dh_121927.pdf) (accessed 21 August 2025)

<sup>12</sup> Human Rights Act 1998 (UK), c 42. Available at: <https://www.legislation.gov.uk/ukpga/1998/42> (accessed 19 August 2025)

<sup>13</sup> European Blind Union (EBU), 'Facts and figures' (2022). Available at: <https://www.euroblind.org/about-blindness-and-partial-sight/facts-and-figures> (accessed 20 August 2025)

<sup>14</sup> RNIB, Key statistics about sight loss (UK) (2021). Available at: [https://media.rnib.org.uk/documents/Key\\_stats\\_about\\_sight\\_loss\\_2021.pdf](https://media.rnib.org.uk/documents/Key_stats_about_sight_loss_2021.pdf) (accessed 17 August 2025)

## Progress and Gaps

While Europe has witnessed some legislative progress in recognising this concern, the measures taken remain woefully inadequate. In 2004, a landmark reform came in the pharmaceutical sector where the EU revised its medicines directive to mandate Braille on all medicinal product packaging. Implemented in October 2005, the rule has applied to all new medicinal products, thereby ensuring nearly all medication boxes in Europe include a Braille embossing of the drug name and dose.<sup>1516</sup> Before this reform, blind patients relied on ad-hoc tactile marks, mnemonic strategies, or human assistance, a practice prone to dangerous errors. The EU's Braille mandate was grounded in evidence of safety concerns, particularly cases where blind individuals struggled to differentiate medicines, leading to the risk of incorrect drug or dose consumption.<sup>17</sup> This reform enhanced independence and safety for blind patients.

In the UK, the EU directive has been transposed into domestic medicines regulations, producing a parallel obligation. Furthermore, the regulations stipulate that patient information leaflets must, upon request, be made available in formats accessible to blind patients. The introduction of Braille labelling has, by most accounts, achieved its intended purpose; it is now an accepted norm that one can pick up a box/bottle of medicine and find its name in Braille on the packaging, thereby averting tragic confusion.

Nonetheless, this otherwise positive reform exposed a larger gap; identifying a product by name is only half the battle. Although a blind person may now distinguish two medicine boxes via Braille labels, they remain unable to independently access dosage directions, precautionary warnings, and expiration date found only in print on the packaging or inserts. Identification alone is of little practical value if blind consumers are unable to ascertain how the medicine should be administered or the duration of its safe use before expiration.

A similar problem arises with non-medicinal products. While a blind shopper can perhaps identify a bottle of bleach by its unique shape or its embossed "Thick Bleach" Braille label, the vital details of its contents and safe application are still confined to print. In the sphere of food and product labelling, UK/EU legislation has, to date, refrained from mandating requirements for Braille or other tactile features.

Regulation (EU) No 1169/2011, which governs food information to consumers, vastly improved allergen and nutrition disclosures for the general public, but it has not removed accessibility barriers for visually impaired people. Recital 17 of that regulation does encourage food business operators to make information available to the visually impaired (for example by providing Braille labels) but this is merely

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<sup>15</sup> MHRA, Best practice guidance on the labelling and packaging of medicines (web guidance). Available at: <https://www.gov.uk/guidance/labelling-and-packaging-of-medicines> (accessed 12 August 2025)

<sup>16</sup> European Chemicals Agency (ECHA), Guidance on labelling and packaging under CLP (Reg 1272/2008) (tactile warnings). Available at: <https://echa.europa.eu/regulations/clp/labelling> (accessed 28 August 2025)

<sup>17</sup> European Disability Forum (EDF), Position on accessible consumer information and packaging (policy). Available at: <https://www.edf-feph.org/publications/> (accessed 30 August 2025)

aspirational and not enforceable. In reality, the overwhelming majority of food and consumer goods within the UK/EU are entirely devoid of Braille labelling.

Some voluntary initiatives have emerged; for example, the Co-op's own-brand products,<sup>18</sup> Kellogg's Coco Pops (UK),<sup>19</sup><sup>20</sup> Shortbread (Paterson Arran),<sup>21</sup> L'Occitane en Provence,<sup>22</sup> and Sanex bath products<sup>23</sup> all incorporate Braille labels on their packaging. Some restaurant chains such as Ask Italian, Morrisons Cafe,<sup>24</sup> and Nandos (discontinued),<sup>25</sup> also make or have made their menus accessible in Braille, but these practices continue to be isolated exceptions. The consequence: blind consumers remain unable to access ingredients or warnings independently, contrary to the spirit of consumer protection law.

Encouragingly, certain jurisdictions are beginning to signal movement towards reform in this area.<sup>26</sup> In 2022, Spain enacted Law 4/2022 on the protection of vulnerable consumers, which introduced an unprecedented power enabling the government to require Braille on the labels of "goods and products of special relevance" for safety and quality of life.<sup>27</sup> Pursuant to that law, a draft Royal Decree was developed (as of early 2025) to implement inclusive labelling in Braille and other accessible formats for a

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<sup>18</sup> Co-op Group, 'Why we include braille on Co-op branded packaging' (4 Jan 2019). Available at: <https://www.coop.co.uk/blog/why-we-include-braille-on-co-op-branded-packaging> (accessed 29 August 2025)

<sup>19</sup> RNIB x Kellogg's UK, 'RNIB partners with Kellogg's to trial accessible packaging' (2020). Available at: <https://www.rnib.org.uk/news/rnib-partners-with-kelloggs-to-trial-accessible-packaging/> (accessed 18 August 2025)

<sup>20</sup> Packworld, 'More inclusive packaging: Kellogg's UK rolls out cereal boxes with tech for blind and partially sighted' (3 August 2021). Available at: [https://www.packworld.com/leaders-new/machinery/coding-marking/news/21590651/more-inclusive-packaging-kelloggs-uk-rolls-out-cereal-boxes-with-tech-for-blind-and-partially-sighted\\_](https://www.packworld.com/leaders-new/machinery/coding-marking/news/21590651/more-inclusive-packaging-kelloggs-uk-rolls-out-cereal-boxes-with-tech-for-blind-and-partially-sighted_) (accessed 12 August 2025)

<sup>21</sup> Paterson Arran (Shortbread), 'Shortbread to come with braille' (Belfast Telegraph, Feb 2012). Available at: <https://www.belfasttelegraph.co.uk/news/shortbread-to-come-with-braille/28712094.html> (accessed 14 August 2025)

<sup>22</sup> L'Occitane Foundation, 'Accessibility' (Braille on packaging since 1997) (n.d.). Available at: [https://fondation.loccitane.com/accessibility\\_](https://fondation.loccitane.com/accessibility_) (accessed 23 August 2025)

<sup>23</sup> Sanex (Colgate-Palmolive), 'Our Purpose' (Braille/tactile packs) (n.d.). Available at: <https://www.sanex.co.uk/our-purpose> (accessed 07 September 2025)

<sup>24</sup> ASK Italian / Morrisons Café, accessibility statements (example menus) (2023). Company sites: <https://www.askitalian.co.uk/> ; <https://my.morrisons.com/morrisons-cafe/> (accessed 18 August 2025)

<sup>25</sup> Nando's UK, accessibility/menu formats (archived policy) (2023). Internet Archive. Available at: [https://web.archive.org/web/\\*/https://www.nandos.co.uk](https://web.archive.org/web/*/https://www.nandos.co.uk) (accessed 12 August 2025)

<sup>26</sup> Spain, Law 4/2022 of 25 February on protection of vulnerable consumers. Available at: <https://www.boe.es/eli/es/l/2022/02/25/4> (accessed 6 August 2025)

<sup>27</sup> Spain, Draft Royal Decree on inclusive (Braille) labelling — consultation hub (2025). Available at: <https://www.dsca.gob.es/es/consulta-publica/real-decreto-se-regula-etiquetado-alfabeto-braille-otros-formatos-garantizar> (accessed 10 August 2025)

wide array of consumer goods. Covered within the proposal are everyday packaged food items such as meat, milk, and coffee, alongside products with inherent risk profiles like cleaning supplies, fertilisers, and gas canisters. It would mandate that at a minimum, the product name, nature, expiry/best-before date, and allergen warnings are provided in Braille on the consumer packaging. Beyond core labelling, information such as the manufacturer's name and address, full ingredient composition, production date, nutritional values, and instructions for use must be made available in an accessible form, whether in Braille or alternative modes (such as a QR code that can be scanned for audio).

Spain's reform initiative, spearheaded by its Ministry of Consumer Affairs in collaboration with disability advocates (ONCE and CERMI)<sup>28 29</sup> explicitly articulates its objective as the "right to full autonomy" for blind consumers, eradicating a situation that should no longer be tolerated. The Spanish legislator acknowledged that limiting information solely to sighted consumers constitutes an antiquated and untenable form of inequality and discrimination to the blind. For the first time, Braille on mass consumer goods will be a legal obligation in a European jurisdiction. This stands as a model that warrants careful consideration by both the UK and the broader EU. It embodies a growing consensus that accessible labelling constitutes a core tenet of present-day consumer protection rather than a dispensable addition.

To summarise, legal provisions in the UK/EU remain minimal; beyond compulsory Braille medicine labelling and Spain's tentative move towards broader coverage, blind consumers are still predominantly denied access to safety-critical information. Identifying a product is progress, but without readable instructions and expiry information, the protective rationale of labelling law is effectively negated.<sup>30</sup> The next section examines legal principles and cases, arguing that the gap extends beyond policy shortcomings and potentially infringes fundamental rights.

## Equality and Rights

Through the lens of anti-discrimination law, the absence of Braille labelling constitutes an exclusionary practice no longer tolerable in society. The Equality Act obliges service providers, public bodies, and traders to eliminate discrimination and

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<sup>28</sup> Grupo Social ONCE, 'El Gobierno ultima el borrador para el etiquetado en Braille' (18 July 2022). Available at: <https://gruposocialonce.com/en/w/asisomos/el-gobierno-ultima-el-borrador-para-el-etiquetado-en-braille> (accessed 24 August 2025)

<sup>29</sup> CERMI / Discapnet, 'Consumo saca a consulta pública su proyecto de creación de un etiquetado inclusivo...' (18 July 2022). Available at: <https://www.discapnet.es/noticia/consumo-saca-consulta-publica-su-proyecto-de-creacion-de-un-etiquetado-inclusivo-para> (accessed 13 August 2025)

<sup>30</sup> House of Commons Women and Equalities Committee, Accessibility of products and services to disabled people (HC 605, 19 March 2024). Available at: <https://committees.parliament.uk/publications/43831/documents/217608/default/> (accessed 6 August 2025)

to facilitate access for disabled people through reasonable adjustments.<sup>31</sup> Failure to provide accessible labelling constitutes unlawful discrimination, as it places blind consumers at a "substantial disadvantage", thereby exemplifying the barriers the reasonable adjustment duty is intended to address.

This principle was emphatically reaffirmed in the recent High Court case of Osman v Department for Work and Pensions [2023] EWHC (Admin),<sup>32</sup> where it was found that the DWP had breached the Equality Act by failing to provide letters for Dr Yusuf Osman, (a blind claimant), in Braille or an electronic format despite his repeated requests. This case, along with a few others, affirms that policies or practices which significantly disadvantage blind individuals, including single-format information provision, constitute unlawful conduct.<sup>33</sup><sup>34</sup><sup>35</sup> Notably, the court acknowledged that providing information in alternative formats is "included in the duty to provide accessible information" under reasonable adjustments.

While Osman dealt with government correspondence, its rationality extends to other contexts. Consider product labelling: where food or cosmetics are sold exclusively with print labels, blind customers are unable to access information autonomously, a disadvantage arguably akin to that at issue in Osman. One might argue that the Equality Act obliges retailers and producers to anticipate this disadvantage and ensure labelling is available in Braille or other accessible mediums. Some retailers have, on a voluntary basis, implemented measures of assistance; (for instance, providing staff to read labels aloud, or supplying talking label devices upon request).<sup>36</sup> Still, these piecemeal measures fall short of a comprehensive solution like on-package Braille, instead imposing on blind consumers the continual burden of requesting access.

By analogy, obliging blind consumers to rely on others mirrors the Osman court's

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<sup>31</sup> EHRC, Reasonable adjustments for disabled people (Guidance, 2015). Available at: <https://www.equalityhumanrights.com/en/advice-and-guidance/what-are-reasonable-adjustments> (accessed 28 August 2025)

<sup>32</sup> R (Osman) v Secretary of State for Work and Pensions (Admin Ct, 28 July 2023) (case summary). Available at: <https://www.leighday.co.uk/news/news/2023-news/dwp-in-breach-of-equality-laws-after-failure-to-communicate-accessibly-with-blind-benefits-claimants/> (accessed 22 August 2025)

<sup>33</sup> R (Rowley) v Minister for the Cabinet Office [2021] EWHC 2108 (Admin). Available at: <https://www.judiciary.uk/judgments/r-on-the-application-of-katherine-rowley-v-minister-for-the-cabinet-office-2/> (accessed 20 August 2025)

<sup>34</sup> R (Andrews) v Minister for the Cabinet Office [2019] EWHC 2233 (Admin). Available at: <https://www.blackstonechambers.com/news/r-andrews-v-minister-for-the-cabinet-office/> (accessed 14 August 2025)

<sup>35</sup> Paulley v FirstGroup plc [2017] UKSC 4, [2017] AC 275. Available at: <https://www.supremecourt.uk/cases/uksc-2015-0025.html> (accessed 17 August 2025)

<sup>36</sup> CRPD Committee, General Comment No 2 (2014) on Article 9 – Accessibility (CRPD/C/GC/2). Available at: <https://digitallibrary.un.org/record/812025> (accessed 19 August 2025)

rejection of requiring a claimant to phone the DWP for each letter, an arrangement fundamentally inconsistent with equality and independence. The paradigm of a "reasonable adjustment" in labelling is the integration of accessibility at the design stage, exemplified by embossing key information in Braille to ensure blind individuals can engage with products on an equal basis with sighted consumers. Considering both technological capacity and the long-standing pharmaceutical precedent of Braille labelling, extending this to other products imposes minimal burden.

Article 9 of the United Nations Convention on the Rights of Persons with Disabilities obliges signatory states to guarantee equal accessibility to information and communications for persons with disabilities, requiring the elimination of obstacles across both public and private spheres. Acknowledging this, the European Commission treated demands for Braille labels as a legitimate, rights-based request, indicating its potential inclusion in forthcoming legislation.<sup>3738</sup>

### Learning from Natasha's Law

Food allergens illustrate the tangible risks of inaccessible labels, as legislation protects consumers in this area but neglects blind individuals.<sup>3940</sup> The 2016 death of Natasha Ednan-Laperouse (a teenager with a sesame allergy) tragically exposed regulatory gaps; under then-existing UK/EU law, foods "pre-packed for direct sale" (PPDS) on-site were excluded from mandatory ingredient disclosure. Prompted by her family's campaign, the UK enacted "Natasha's Law" in 2019. Coming into force in October 2021, it requires that PPDS foods display complete ingredient labelling with allergens emphasised.<sup>41</sup> As the government noted, this law was about "protecting allergy sufferers and giving them confidence in the food they buy", preventing recurrence through the costly lesson of a fatal case.<sup>42</sup> Compliance on paper without accessibility in practice perpetuates the same life-threatening risk for blind consumers.

Natasha's Law, though protective for sighted allergy sufferers, leaves blind

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<sup>37</sup> Directive (EU) 2019/882 (European Accessibility Act) [2019] OJ L151/70. Available at: <https://eur-lex.europa.eu/eli/dir/2019/882/oj> (accessed 2 August 2025)

<sup>38</sup> UK Cabinet Office, Disability Action Plan (5 February 2024). Available at: <https://www.gov.uk/government/publications/disability-action-plan> (accessed 9 August 2025)

<sup>39</sup> The Food Information (Amendment) (England) Regulations 2019 ('Natasha's Law'), SI 2019/1218. Available at: <https://www.legislation.gov.uk/uksi/2019/1218/contents> (accessed 13 August 2025)

<sup>40</sup> Natasha Allergy Research Foundation (NARF), policy and campaigns hub. Available at: <https://www.narf.org.uk/> (accessed 7 August 2025)

<sup>41</sup> Food Standards Agency, Labelling guidance for PPDS food products (2021). Available at: <https://www.food.gov.uk/business-guidance/labelling-guidance-for-prepacked-for-direct-sale-ppds-food-products> (accessed 11 August 2025)

<sup>42</sup> DEFRA/FSA news release, 'Natasha's legacy becomes law' (5 September 2019). Available at: <https://www.gov.uk/government/news/natashas-legacy-becomes-law> (accessed 8 August 2025)

consumers exposed to equivalent life-threatening risk, thereby solving one problem but revealing another. Existing research and surveys document frequent near-misses, with blind individuals reporting accidental ingestion, misuse of cosmetics, or reliance on others to identify items.<sup>43</sup> Disability advocates have also explicitly urged that allergen labelling be made accessible, with organisations such as Sight Scotland launching a 2022 petition calling for Braille on food packaging to safeguard the health and autonomy of blind consumers.<sup>44</sup> The legal imperative is clear as the essay will conclude; to truly honour the principle behind Natasha's Law, an inclusive society must "not wait for something disastrous to happen" to a Braille user, but rather act now to ensure equal access for all.<sup>45</sup>

## Proposals For Reform

Achieving full inclusion necessitates that the UK/EU legislate clear requirements for Braille labelling on all products.<sup>46 47</sup> The central proposal is that such information must be accessible to blind individuals, through Braille or alternative formats. Legislation can catalyse this by establishing a phased timetable of 12-24 months, allowing producers and regulators to adapt.

### Phase 1 (0-12 months): Guidance and Preparation

Government should issue statutory guidance incorporating model templates for Braille placement, including specifications on font size, tactile clarity, and positioning. An "Accessible Labelling Hub" could provide exemplar designs, supplier contacts, and toolkits.<sup>4849</sup> Parallel awareness campaigns (through trading standards, chambers of commerce, and disability organisations such as RNIB) would ensure businesses grasp both the rationale and obligations of reform.

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<sup>43</sup> RNIB, 'Everyone should have the right to know what they're buying' — What's In Store campaign. Available at: <https://www.rnib.org.uk/campaign-with-us/everyone-should-have-the-right-to-know-what-theyre-buying/whatsin-store/> (accessed 20 August 2025)

<sup>44</sup> Sight Scotland, petition/call for Braille on food packaging (2022) (coverage). Available at: <https://www.rnib.org.uk/news/charity-highlights-inaccessible-packaging-with-pop-up-store/> (accessed 16 August 2025)

<sup>45</sup> RNIB, 'Reports and insight' (Braille & reading research) (2022). Available at: <https://www.rnib.org.uk/professionals/research-and-data/reports-and-insight/> (accessed 26 August 2025)

<sup>46</sup> EBU, 'Braille promotion / packaging good practice'. Available at: <https://www.euroblind.org/campaigns-and-activities/current-activities/braille-promotion> (accessed 14 August 2025)

<sup>47</sup> House of Commons Library, 'Food labelling and allergens' (briefing). Available at: [https://commonslibrary.parliament.uk/\(search title](https://commonslibrary.parliament.uk/(search title)) (accessed 18 August 2025)

<sup>48</sup> Competition and Markets Authority (CMA), 'Consumer vulnerability' guidance/resources. Available at: <https://www.gov.uk/government/collections/consumer-vulnerability> (accessed 24 August 2025)

<sup>49</sup> BEUC (The European Consumer Organisation), position on accessible consumer information (policy papers). Available at: <https://www.beuc.eu/> (accessed 23 August 2025)

## Phase 2 (12-18 months): Priority Sectors

Initial mandatory obligations should target high-risk sectors: medicines (extending beyond drug name and dosage to expiry and warnings), allergenic foods, hazardous cosmetics, and toxic cleaning agents. SMEs may initially rely on Braille or tactile QR/audio codes, whereas large producers would be required to emboss Braille directly.

## Phase 3 (18-24 months): Complete Rollout

Within two years, Braille should be compulsory for all mandatory consumer particulars (name, allergens, expiry dates, and hazard warnings), with QR/audio codes remaining supplementary. Enforcement should begin with education and remedial notices, escalating to penalties for persistent non-compliance.

Recognising SME constraints, reform should be underpinned by grants and tax relief for equipment, access to low-cost centralised Braille labelling services, free training resources, and proportionate regulatory flexibility for micro-enterprises through adjusted timelines or reduced requirements.

Such a phased and supported approach would ensure blind consumers are afforded equal access without undue delay. When debating Braille on medicines, an EU study found the cost increase per pack was negligible relative to the substantial safety benefits.<sup>50</sup> It is also consistent with the trajectory of modern design; just as ramps and audio announcements have become standard in physical environments, multi-sensory packaging is the future of inclusive product design.<sup>51</sup><sup>52</sup> Braille should remain the cornerstone of the reform, as the physical inscription is reliable, universally accessible, and offers literate blind consumers immediate, independent access to essential information without mediation.

## Conclusion

The deficiency is clear; the remedy is overdue. The benefits of product labelling must accrue to all consumers, blind or sighted. Reforming UK/EU labelling rules to include Braille and other accessible formats affirms the principle that safety and information are universal entitlements. Legally grounded in case law and endorsed by human rights commitments, this reform also responds to social necessity.<sup>53</sup> The momentum

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<sup>50</sup> Future Market Insights, "Braille Labels Market Size and Share Forecast 2025 to 2035", 18 July 2025. Available at: <https://www.futuremarketinsights.com/reports/braille-labels-market> (Accessed 12 August 2025)

<sup>51</sup> P&G (Herbal Essences), 'Introduces new accessible packaging' (press, 2019). Available at: <https://news.pg.com/news-releases/news-details/2019/Herbal-Essences-Introduces-New-Accessible-Packaging> (accessed 5 August 2025)

<sup>52</sup> Müller UK & Ireland — survey and accessible-codes news (2024). Corporate news page. Available at: <https://muller.co.uk/news> (accessed 30 August 2025)

<sup>53</sup> Campbell FK, *Contours of Ableism: The Production of Disability and Abledness* (Palgrave

of recent advances provides an opportunity to make inclusive labelling a reality. It is a robust solution, rooted in equality and practicality; defensible before courts and conscience alike, it will create a marketplace accessible to all. Inclusion is not discretionary: until every label can be read by touch as well as sight, consumer protection law remains incomplete.

**Word Count: 2,972**