



Draft Royal Decree

regulating the accessible labelling of consumer products

ROYAL DECREE .../2026 of regulating the accessible labelling of consumer products.

I

The purpose of the International Convention on the Rights of Persons with Disabilities, of 13 December 2006, ratified by Spain in 2008, is to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity. Following its ratification by Spain, this human rights treaty is part of the Spanish legal system by virtue of Article 10, Section 2, and Article 96 of the Spanish Constitution.

Article 49 of the Spanish Constitution, as amended by the reform, of 15 February 2024, to bring it into line with the framework of the Convention, provides for a human rights approach to disability and requires public authorities to promote policies that guarantee the full autonomy and social inclusion of persons with disabilities, in universally accessible environments.

Article 51 of the Spanish Constitution, in turn, calls on the public authorities to safeguard consumers and users by protecting, through effective procedures, their safety, health and legitimate economic interests, while also promoting consumer information and education.

Accordingly, ensuring the rights of persons with disabilities in the consumer context is a key factor in promoting their social inclusion and personal autonomy, in accordance with the requirements of the Convention on the Rights of Persons with Disabilities, as well as in accordance with the provisions of the consolidated text of the General Law on the rights of persons with disabilities and their social inclusion, approved by Legislative Royal Decree 1/2013, of 29 November 2013.

Thus, Article 6 of the aforementioned consolidated text, concerning respect for the autonomy of persons with disabilities, states that they have the right to free decision-making, for which information must be provided and consent given, in appropriate formats and according to personal circumstances, following rules based on the principle of universal design or design for all persons such that they are accessible and understandable. To guarantee this universal accessibility, Title III provides for regulation of the regime of offences and sanctions in the field of equal opportunities, non-discrimination and universal accessibility of persons with disabilities.



In the light of this constitutional mandate, it was also necessary to define the concept of 'vulnerable consumer' in the national legislation on the protection of consumers and users, with the aim of ensuring a higher level of protection for those rights, in certain cases in which the consumer is affected by vulnerability.

To this end, Law 4/2022, of 25 February 2022, on the protection of consumers and users against situations of social and economic vulnerability amended the consolidated text of the General Law for the Protection of Consumers and Users and other complementary laws, approved by Royal Legislative Decree 1/2007, of 16 November 2007, and specifically Article 3 thereof, to define the concept of 'vulnerable consumer'. Thus, Article 3, Paragraph 2, of the aforementioned law states that 'vulnerable consumers in relation to specific consumer relations are those natural persons who, individually or collectively, due to their personal, economic, educational or social characteristics, needs or circumstances find themselves in a particular situation of subordination, defencelessness or lack of protection that prevents them from exercising their rights as consumers on equal terms, even if territorially, sectorally or temporarily'. Consequently, persons with disabilities should be considered vulnerable consumers in cases where accessibility failures in this area compromise the exercise of their rights as consumers and users under conditions of equality and non-discrimination.

According to the 2020 Survey on Disability, Personal Autonomy and Dependency Situations (EDAD), of the National Institute of Statistics, 4.38 million people in Spain currently have some type of disability and may therefore encounter various situations of vulnerability when engaging in consumer transactions. This is because, on numerous occasions, the market for goods and products does not meet universal accessibility standards. In addition, persons with disabilities often have difficulties in accessing information, especially persons with visual impairment in relation to access to the information on labels of goods and products for everyday use. According to the assessment of the State Database of Persons with Disabilities by the Institute for the Elderly and Social Services (IMSERSO), in 2024, more than 404 644 people (193 471 men and 211 173 women) had visual impairment as their primary disability, and more than 1014 people had deafblindness as their primary disability.

For this reason, the first additional provision of the aforementioned Law 4/2022, of 25 February 2022, urges the Government to regulate labelling in Braille, as well as in other formats that guarantee the universal accessibility of those consumer goods and products that are of special relevance to protection of the safety, integrity and quality of life, especially of persons with visual impairment as vulnerable consumers. This royal decree implements the above-mentioned additional provision by introducing accessible labelling as a measure to ensure universal accessibility in the process of purchasing regulated consumer goods and products, thereby complying with the Spanish Government's commitment to promoting more accessible and inclusive consumption for persons with disabilities.

However, this royal decree is not only intended to fulfil a legal requirement set out in Law 4/2022, of 25 February 2022, but also, and quite specifically, to serve as a means of complying with the obligations undertaken under the International Convention on the Rights of Persons with Disabilities. In particular, the initiative is consistent with Articles 3, 4, 9, 19 and 21, of the



Convention, which relate to the adoption of legislative measures to give effect to the rights recognised in the Convention regarding accessibility and access to information, as well as to the general principle of non-discrimination.

It also follows the conclusions of the Employment, Social Policy, Health and Consumer Affairs Council, of 17 October 2025, urging for the promotion of independent living for persons with disabilities through universal accessibility.

This conviction is reiterated in the current European Strategy for the Rights of Persons with Disabilities 2021-2030, which states that ‘accessibility to built and virtual environments, information and communications technologies, goods and services, including transport and infrastructure, is a tool for exercising rights and a prerequisite for the full participation of persons with disabilities on an equal basis with others’. In turn, the Strategy sets out a commitment to pay attention to the ‘correct implementation and assessment of all EU regulations governing accessibility’ and to identify ‘gaps and the need for further legislative action’.

II

With regard to persons with visual impairments, both the Braille reading and writing system and other accessible technology-based formats constitute essential means of communication and of access to information and knowledge. Likewise, the use of other accessible labelling tools, linked to cognitive accessibility or accessibility to information and communication, are key to ensuring safety and equality for persons with disabilities as consumers.

In this sense, it should be noted that the Spanish Braille Commission is the reference expert body in Spain for setting regulations for the use and development of the Braille reading and writing system, as it establishes the criteria and guidelines that ensure correct use of the Braille system and certifies that its use complies with the standards and regulations.

Furthermore, technological advances and digitalisation are key to providing clear, accessible and user-friendly information on goods and products, provided that they are accompanied by a non-discriminatory approach to digital transformation, thereby ensuring universal accessibility in more and new contexts. Thus, this digital transformation offers enormous potential for accessible consumption. One example of these new opportunities would be the use of quick response (QR) codes, or similar tools, in the labelling of consumer goods and products, as well as other technology-based applications.

III

As regards the structure of this regulation, it consists of six articles, as well as two additional provisions, one transitional, four final provisions and an annex. Article 1 sets out the purpose and scope of the regulation; Article 2 defines the nature of accessible labelling; and Article 3 addresses the accessible labelling that may accompany products made available to the public in establishments that meet certain criteria.

Articles 4 and 5 are aimed at promoting accessible labelling and public-private collaboration for this purpose and Article 6 sets out the sanctions regime.



Pursuant to the first additional provision, an exemption from the application of the regulation is provided for products that are already labelled in Braille. The second additional provision sets out the obligation to provide information on the accessibility measures available at each establishment, and the transitional provision establishes a transitional period of eighteen months for compliance with the regulation.

Finally, the final provisions include the relevant legal bases, the requirement to carry out an *ex post* evaluation of the regulation, as well as the possibility of implementing regulations by the Minister for Social Rights, Consumer Affairs and the Agenda, 2030.

This royal decree meets the principles of necessity, effectiveness, proportionality, legal certainty, transparency and efficiency laid down in Article 129 of Law 39/2015, of 1 October 2015, on Common Administrative Procedures in Public Administration.

The compliance of the proposed regulation with the principles of necessity and effectiveness derives from the protection of the general interest, as well as from the need to fulfil the legal obligation to develop implementing provisions on inclusive labelling established by Law 4/2022, of 25 February 2022. This royal decree also complies with the principle of proportionality, since it regulates the aspects essential for establishing the legal regime applicable to accessible labelling, limiting it to situations in which the consumer or user is sued, without imposing an obligation of general application.

As regards the principle of legal certainty, the regulation clearly sets out the limits to be applied and is consistent with the rest of the legal order in that, primarily, it implements Law 4/2022 of 25 February and is aligned with the provisions of Regulation (EU) 2025/40 of the European Parliament and of the Council, of 19 December 2024, on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC.

In addition, the regulation complies with the principle of efficiency, since its application does not impose administrative burdens and contributes to the rational management of existing public resources. Finally, this royal decree complies with the principle of transparency, since it clearly identifies the objectives pursued and provides a full explanation of its content. During its preparation, close consultations were held with organisations from the consumer and disability sectors, and public participation was facilitated through the preliminary public consultation process and the public hearing and information procedures. The text was also informed by the national Council of Consumers and Users (CCU) and the National Disability Council.

This royal decree advances achievement of the Sustainable Development Goals (SDGs) of the Agenda 2030, mainly SDG 10 (Reduced Inequalities) and SDG 12 (Responsible Consumption and Production).

This royal decree is issued pursuant to the provisions of Article 149, Section 1, Points i and xiii, of the Spanish Constitution, which grant the State exclusive competence, respectively, for regulation of the basic conditions guaranteeing the equality of all Spaniards in the exercise of their rights and



the fulfilment of their constitutional duties, and in relation to the bases and coordination of the general planning of economic activity.

The opinion of the autonomous communities and the cities of Ceuta and Melilla were sought through the Sectoral Consumer Affairs Conference, the Territorial Council of Social Services and the System for Autonomy and Care for Dependency, and consultations were held with the Consumers and Users Council, other consumer and user associations, and business organisations registered in the relevant registers or repositories, as applicable.

By virtue thereof, at the proposal of the Minister for Social Rights, Consumer Affairs and Agenda 2030, with the prior approval of the Minister for Digital Transformation and Civil Service, in agreement with the Council of State, and after deliberation by the Council of Ministers at its meeting on XX XXX.

I HEREBY DECREE THE FOLLOWING:

Article 1. Scope and purpose

1. The purpose of this royal decree is to regulate labelling that ensures the universal accessibility to those consumer goods and products that are of particular relevance to protection of the safety, integrity and quality of life of persons with disabilities, especially persons with visual impairment, as vulnerable consumers.

The consumer goods and products referred to in this paragraph are those included in the annex to this regulation.

2. The provisions contained in this royal decree shall apply to economic operators managing commercial establishments in Spanish territory with a sales and display area equal to or greater than 1 000 m², who shall be responsible for ensuring compliance with the obligations introduced by this regulation.

Article 2. Accessible labelling.

1. Accessible labelling means any words, indications, marks, designs or signs relating to a good or product that appear on any label accompanying or referring to that good or product and that enable persons with disabilities, particularly those with visual impairments, to identify such goods or products and to obtain truthful, effective and sufficient information about their essential characteristics in an unambiguous, clear and comprehensible manner.

2. Accessible labelling shall make use of the Braille system.

3. The various accessibility formulas on the labelling may be applied on the same product simultaneously.



4. Without prejudice to the exceptions provided for by law or regulation, the compulsory particulars of the accessible labelling must appear at least in Spanish.

Article 3. *Accessibility obligations.*

1. Economic operators running commercial establishments that market the consumer goods and products included in the annex to this regulation shall guarantee the services mentioned in this article.

2. The retail outlets mentioned in the previous section with a sales and display area of 1 000 m² or more must provide a Braille printing service to visually impaired consumers and users, at their request at the time of purchase, and on one label per product, containing the following information:

1. Product type and trademark.

2. Indication of the reference 'a/i' where the product contains ingredients or processing aids causing allergies or intolerances, as listed in Annex II to Regulation (EU) No 1169/2011 of the European Parliament and of the Council, of 25 October 2011, on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004.

3. 'Use by' or 'best before' dates, as appropriate, in the case of food products.

The label shall be adhered to the product itself or provided with additional labelling in the event that the surface of the product is not adequate or sufficient.

Commercial establishments may include in Braille any additional information deemed necessary.

3. The establishments referred to in Paragraph 2, which have an electronic sales service, must include, on their respective website, which must be accessible in accordance with Article 2, Paragraph 2, Letter f), of Law 11/2023, of 8 May 2023, transposing Directives of the European Union on the accessibility of certain products and services, migration of highly qualified persons, taxation and digitalisation of notarial and registration actions, and amending Law 12/2011, of 27 May 2011, on civil liability for nuclear damage or damage caused by radioactive materials, an option ensuring that the products purchased by that means are delivered with the label provided for in Paragraph 2, at the request of the consumer or user with visual impairment.

4. All retail establishments, regardless of their sales and display area, that market the consumer goods and products included in the annex to this regulation, must offer personal assistance to persons with visual disabilities. In addition, ad hoc assistance will be provided to those who, due to their disability, request it during the purchasing process, in accordance with the provisions of Article 11 of Royal Decree 193/2023, of 21 March 2023, which regulates the basic conditions of



accessibility and non-discrimination for persons with disabilities regarding access to and use of goods and services available to the public.

5. The provision of the services referred to in this article must not entail any cost to consumers and users with disabilities, and must be provided on the same terms as for other consumers.

Article 4. Promotion of accessible labelling.

1. Public administrations, within the scope of their respective powers, shall raise awareness among manufacturers, economic operators managing retail establishments and sectoral associations of the need to extend accessible labelling to all products and consumer goods, with particular attention to labelling in the Braille system.

2. Economic operators may include on the labelling of the products they market a quick response (QR) code or another similar system, or features relating to cognitive accessibility or accessibility to information and communication, as well as any other features that, through technological means, promote universal accessibility. Access to this information shall not, under any circumstances, require identification, data processing or any cost to the recipient.

Article 5. Advice and support on accessible labelling and appropriate service to persons with disabilities.

1. Economic operators managing commercial premises, either individually or through their collective business representative organisations, may establish frameworks for cooperation regarding accessible labelling and appropriate service to persons with disabilities, amongst themselves, with ONCE, through the Spanish Braille Commission, with third sector organisations working in the field of disability and with consumer and user organisations, with a view to promoting the protection of consumers in vulnerable situations.

2. Without prejudice to other actions that other public authorities may carry out within the specific scope of their competences, the competent Public Administrations may request the cooperation of ONCE, through the Spanish Braille Commission, third-sector disability organisations and consumer and user associations in publicising, promoting, disseminating and ensuring correct use of the Braille system in the field of consumer affairs, all under the terms laid down in Royal Decree 358/1991, of 15 March 1991, reorganising the Spanish National Organisation of the Blind (ONCE).

3. Public administrations may enter into agreements with third-sector disability organisations on issues relating, inter alia, to the scope of application of the royal decree, as well as receive the advice of the Royal Board on Disability, through its Advisory Centres, under the terms provided for in Royal Decree 946/2001, of 3 August 2001, approving the Statute of the Royal Board on Disability and other applicable legislation, as well as from the Imserso State Reference Centre for Personal Autonomy and Assistive Technology.



Article 6. *Sanctions regime.*

1. Failure to comply with the accessibility obligations in Article 3, as well as the provision of information by accessible means that is not a faithful reflection of the information provided through other means of labelling, shall constitute an infringement in the field of equal opportunities, non-discrimination and universal accessibility for persons with disabilities, in accordance with Article 81, Paragraph 3, Letter b, of the revised text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013, of 29 November 2013.

2. Where the non-compliance is due to defects, inaccuracies or omissions in the non-accessible labelling of the product being transferred into the accessible part of the labelling, it shall be considered an offence in the context of consumer and user protection, food quality protection or health protection in accordance with the provisions of Article 47, Letter g), of the consolidated text of the General Law for the Protection of Consumers and Users and other complementary laws, approved by Royal Legislative Decree 1/2007 of 16 November 2007, and in the applicable legislation of the Autonomous Communities on food quality protection or health protection respectively.

First additional provision. *Exemption for pre-existing Braille labelling.*

Products that are already labelled in Braille are exempt from the accessible labelling requirements set out in Article 3, Paragraph 2 and 4, provided that they include at least the minimum information specified in Article 3, Paragraph 2.

Second additional provision. *Information on the accessibility measures available in commercial establishments.*

Economic operators shall provide, through their websites, complete information on the establishments that have the services referred to in Article 3, Paragraph 2, as well as their location and opening hours.

Single transitional provision. *Transitional regime.*

Commercial establishments to which this regulation applies shall have a maximum of 18 months from its entry into force to take the necessary measures to comply with it.

First final provision. *Jurisdiction*

This royal decree is issued pursuant to the provisions of Article 149, Section 1, Points i and xiii, of the Spanish Constitution, which grant the State exclusive competence, respectively, for regulation of the basic conditions guaranteeing the equality of all Spaniards in the exercise of their rights and the fulfilment of their constitutional duties, and for the establishment of the basic framework and coordination of the general planning of economic activity.



Second final provision. *Assessment of the regulation.*

Within two years of the entry into force of this royal decree, the Ministry of Social Rights, Consumer Affairs and Agenda 2030 shall prepare an assessment report on its implementation and on the status and development of the accessible labelling, with a particular focus on labelling in the Braille system, with a view to providing a basis for future proposals for its development or amendment.

Third final provision. *Legislative development.*

The Minister for Social Rights, Consumer Affairs and Agenda 2030 is empowered to issue any provisions necessary for the development of this Royal Decree.

Fourth final provision. *Entry into force.*

This royal decree shall enter into force on the day after its publication in the 'Official State Gazette'.



ANNEX

Consumer products of particular relevance to the protection of safety, integrity and quality of life

- a) Cosmetic and personal care products, in accordance with Royal Decree 85/2018, of 23 February 2018, regulating cosmetic products, and, where applicable, Royal Decree 1599/1997, of 17 October 1997, on cosmetic products.
- b) Detergents and cleaners, in accordance with Royal Decree 770/1999, of 7 May 1999, approving the technical and health regulations for the manufacture, circulation and trade of detergents and cleaners.
- c) Food products, as defined in Law 28/2015, of 30 July 2015, on the protection of food quality.