

## **Review of the Balance of Competences: Transport Optical Confederation response**

1. Thank you for consulting the Optical Confederation on the Review of the Balance of Competences specifically related to Transport.
2. The Optical Confederation represents the 12,000 optometrists, the 6,000 dispensing opticians and 7,000 optical businesses in the UK who provide high quality and accessible eye care services to the whole population. The Confederation is a coalition of the five optical representative bodies: the Association of British Dispensing Opticians (ABDO); the Association of Contact Lens Manufacturers (ACLM); the Association of Optometrists (AOP); the Federation of Manufacturing Opticians (FMO) and the Federation of Opticians (FODO). As a Confederation, we work with others to improve eye health for the public good.
3. As a number of the abovementioned bodies are members of the European Council of Optometry and Optics (ECOO)<sup>1</sup>, the Optical Confederation as a whole is well accustomed to working with the European Union Institutions (EUIs). For example, we regularly share the views of our members through ECOO in response to consultations launched by the EUIs, thereby ensuring that the optical and optometric position of the UK is understood and taken into account.<sup>2</sup>
4. Since 2008 we have been a proactive member of Vision 2020 UK and the cross-sector UK Vision Strategy (a Vision 2020 UK initiative led by the Royal National Institute for Blind People and involving all four UK Governments).<sup>3</sup> The UK Vision Strategy was developed in response to the World Health Assembly Vision 2020 resolution to reduce avoidable blindness by the year 2020.<sup>4</sup>
5. In February 2013, we responded to the review of competences with regard to Health<sup>5</sup>, in which we stressed that there was a greater leadership role for the EU to play in highlighting the public health and prevention contributions to the European economy, due to the fact that patients move across borders and our economies are highly integrated. We hope this response will be shared between Department of Health and Department for Transport.

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<sup>1</sup> The European Council of Optometry and Optics (ECOO) is the European umbrella organisation which represents the interests of more than 75,000 optometrists and opticians from 27 European countries. More details are available here: <http://www.ecoo.info/>

<sup>2</sup> A list of recent consultations submitted by ECOO can be found here: <http://www.ecoo.info/projects-and-eu-affairs/consultations/> (Last accessed: February 2013)

<sup>3</sup> Members of the Optical Confederation were involved in the development of the strategy with a view improving the eye health of the nation, a key aim of the strategy.

<sup>4</sup> <http://www.who.int/blindness/partnerships/vision2020/en/index.html> (Last accessed: February 2013)

<sup>5</sup> <http://www.opticalconfederation.org.uk/downloads/consultations/Review-of-Balance-of-Competencies---OC-FINAL-response-Feb-2013.pdf> (Last accessed: July 2013)

6. Similarly, for this review, the Optical Confederation would welcome a greater role for the EU Institutions to play in the field of transport, as there are thousands of drivers who travel across borders, for example, 2 million British drivers cross into neighbouring Members States every year<sup>6</sup>. We would therefore like reassurance that these drivers can see clearly to drive safely. Two potential areas we feel are pertinent are, those concerning “the promotion of high safety standards” (paragraph 18, page 10) and the harmonisation of the assessment of eyesight standards for drivers across Europe in accordance with the EU Driving Licence Directives<sup>7</sup>. This would support the European Commission’s vision to halve the overall number of road deaths in the EU between 2010 and 2020 (Part D.8, page 44), which we support.
7. The Optical Confederation has consistently called for greater consistency on drivers’ vision. In our view, the UK has not implemented the EU Driving Licence Directives to best effect. The number plate test is not an accurate method to assess whether drivers meet these tougher measures as it is not a consistent and robust assessment of visual acuity, and it does not check a person’s peripheral (side) vision. The Optical Confederation continues to call on the UK Government to introduce vision screening for all drivers throughout their driving career to ensure they meet these requirements. This will also reassure drivers that they have safe vision to drive and that they meet the legal eyesight requirements.
8. We would also urge the Department for Transport to work with the European Union Institutions to improve sharing of relevant information or data, such as cross border information on road safety standards and road fatalities related to eyesight (Part D.12, page 45).
9. As explained in this review, quite rightly it is the responsibility of the European Parliament and the Council to provide for measures to improve road safety. For illustration, we welcomed the adoption by the European Parliament of an Own Initiative Report from the Transport and Tourism Committee on European Road Safety 2011-2020 (2010/2235 INI). In particular, this Report stated that the European Parliament: *“calls for an eye test for all drivers in categories A and B every 10 years and for drivers older than 65 years every 5 years; calls on the Member States to establish an obligatory medical check for drivers at a certain age, to identify the physical, mental and psychological ability required to continue driving on the basis of their statistical accident data for the respective age groups”* (Paragraph 37).<sup>8</sup>

In line with the European Parliament’s views, the Optical Confederation propose a fairer, scientific and validated model of driver vision screening in the UK with ongoing assessment for all drivers as part of licence renewal. We believe that this would help to achieve safer roads at a minimal cost to the driver and

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<sup>6</sup> RAC, Driving Abroad Report, page 2, <http://www.rac.co.uk/pdfs/report-on-motoring/driving-abroad-report.aspx>

<sup>7</sup> 2006/126/EC and 2009/113/EC Directives

<sup>8</sup> <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P7-TA-2011-408> (Last accessed: July 2013)

Government, with the offsetting benefit of picking up avoidable sight loss and potentially causing less road incidents. This proposal has been echoed by a range of road safety organisations.

10. We are very happy for this response to be made publicly available.

### **Questions**

- **What are the advantages and disadvantages to the UK of EU action in the field of transport?**

N/A

- **To what extent has the EU succeeded in creating an internal transport market: how far has this contributed to economic growth in the UK? What have been the costs and benefits?**

N/A

- **To what extent is the EU internal transport market necessary for the effective functioning of the EU internal market as a whole?**

N/A

- **To what extent is EU action to harmonise social and environmental standards (e.g. to ensure safety and security or to limit vehicle emissions) necessary for the proper functioning of the internal transport market as opposed to desirable in its own right?**

N/A

- **What impact has EU action had on different stakeholders; for example, has it provided the right balance between consumers and transport operators?**

N/A

- **The EU's competence in the field of transport has primarily been exercised through legislation and clarified through case law. To what extent has the EU approach been proportionate: what alternative approaches would benefit the UK?**

N/A

- **To what extent could the UK national interest be better served by action taken as a national or wider international level, rather than by the EU, and vice versa?**

In the light of our experience with the UK's recent implementation of the Driving Licence Directives, we would have concerns about the standards being set nationally. As noted above, huge numbers of drivers move between Member States and we would wish to have reassurances that all have adequate vision to drive safely.

- **What advantages or disadvantages are there for the UK in the EU having greater or lesser say in negotiating agreements internationally (e.g. ICAO or IMO) or with third countries (e.g. EU-US, EU-China)?**

N/A

- **What challenges or opportunities are there for the UK in further EU action on transport?**

As noted above, we feel that acting on priority actions in the European Parliament's Own Initiative Report provides a framework and a starting point for further moves to improve road safety. We would like to see this as a priority for the UK Government.

Submitted by Ben Cook on behalf of the Optical Confederation  
August 2013