



To the attention:
Dubravka Šuica
Vice-President for Democracy and Demography
European Commission

20 April 2021

Subject: Letter by ECOO, GCOA and IAPB on the Green Paper on Ageing

Dear Vice-President Šuica,

The European Council of Optometry and Optics (ECOO), the Global Coalition on Aging (GCOA) and the International Agency for the Prevention of Blindness (IAPB) call upon the European Commission to include vision and eye health into the Green Paper on Ageing “Fostering solidarity and responsibility between generations” as well as into any related future work strands and policy initiatives.

We appreciate and support the life-cycle approach taken by the Green Paper with the purpose of launching a “broad policy debate on ageing”. Such a broad approach needs to be comprehensive of the most important factors that will enable the two policy concepts: healthy and active ageing and lifelong learning.

The risk of vision loss increases as you age. Over 73% of people with vision loss are older adults¹. Without the ability to see, older adults struggle to learn, read or gain fulfilling employment, and will be more likely to suffer depression, exclusion and die earlier. It is thus a fundamental precondition that needs to be acknowledged in the paper and included in all relevant future policies.

The Green Paper refers to a number of non-communicable diseases, which are leading causes of avoidable deaths for under 75 years in Europe. In the same logic, it needs to be noted that over 90% of vision loss is avoidable². According to the IAPB Vision Atlas, in 2020 in Western Europe, there were an estimated 32 million people with vision loss. Of these, 1.5 million people were blind.³ The majority of eye diseases are most prevalent in older adults and, if detected early, can be treated or their progression can be slowed significantly. This is a key element to ensure that older adults can have a *“positive impact on the labour market, employment rates and our social protection systems, and thereby on the growth and productivity of the economy.”*

¹ IAPB Vision Atlas: <https://www.iapb.org/learn/vision-atlas/inequality-in-vision-loss/age/>

² The Lancet Global Health, [The Lancet Global Health Commission on Global Eye Health: Vision Beyond 2020](https://www.thelancet.com/commission/global-eye-health).

³ IAPB Vision Atlas: <https://www.iapb.org/learn/vision-atlas/magnitude-and-projections/gbd-regions/western-europe/>



Eye conditions and vision impairment pose a significant personal and societal burden. Surveys have shown that people fear losing their vision more than any other sense⁴ Those with preventable vision loss become needlessly reliant on a care system, posing considerable and avoidable costs in health and social care and in lost productivity. But the investment required to address poor vision is a fraction of those losses⁵. It thus makes economic and social sense to give this topic the attention it deserves.

The European Commission has already acknowledged the importance of this topic in a workshop entitled “A Life Course of Healthy Vision: Shaping the European Policy Agenda” hosted on 3 December 2019. We therefore sincerely hope that future papers, policy documents or other initiatives place vision at the centre of the debate, together with the other health-related considerations already included.

The promotion of regular eye checks needs to be supported by public policy and awareness. It should be noted in particular that an eye examination is not just checking vision, it is also a healthcare check. The back of the eye is the only part of the body where blood vessels can be assessed through visual inspection and without an invasive procedure. Issues such as diabetes, hypertension and neurological conditions such as Multiple Sclerosis can be detected through an eye exam.⁶

Furthermore, the WHO World Report on Vision⁷ states that the optometric profession is still not recognised in many countries, notwithstanding the progress made on the training standards for optometrists, optometric technicians and optical technicians. The report points out that the lack of professionals that are accredited to carry out independent eye care services could lead to decreased productivity. This will have an obvious effect on the access to quality eye care and should be addressed in guidance to Member States and subsequent policy initiatives.

It is often thought that visual impairment and blindness does not lead to death. However, the recently published Lancet Global Health Commission on Global Eye Health found that those with poor eye health have a 2.6 times increased risk of mortality⁸. Vision impairment causes or exacerbates other conditions, either directly, as with injuries such as falls (see below) and road traffic accidents, or indirectly, through reduced access to healthcare, limitations in physical activity or increased social isolation. People with vision impairments also have an

⁴ Evaluating Whether Sight Is the Most Valued Sense, Jamie Enoch, MSc; Leanne McDonald, MSc; Lee Jones, PhD; et al, October 2019, JAMA Ophthalmology,

<https://jamanetwork.com/journals/jamaophthalmology/article-abstract/2752217>

⁵ Gordois, A., Cutler, H., Pezzullo, L., Gordon, K., Cruess, A., Winyard, S., Hamilton, W., Chua, K. (2012). ‘An estimation of the worldwide economic and health burden of visual impairment’. Global Public Health, 7 (5), 465-481; and see WHO World Report on Vision (<https://www.who.int/publications/i/item/9789241516570>)

⁶ Cognitive impairment negatively impacts allied health service uptake: Investigating the association between health and service use; Catherine A. MacLeod et. al.; March 2021,

<https://www.sciencedirect.com/science/article/pii/S2352827320303578>

⁷ WHO World Report on Vision (<https://www.who.int/publications/i/item/9789241516570>)

⁸ The Lancet Global Health, [The Lancet Global Health Commission on Global Eye Health: Vision Beyond 2020.](https://www.thelancet.com/commission/global-eye-health)



increased risk of health conditions. Depression is known to be greater in the visually impaired population,⁹ and one of the biggest worries in healthcare today is the increase in dementia. According to the WHO, there are 50 million dementia cases worldwide with 10 million new cases every year.¹⁰ Studies have shown that maintaining good vision will help dementia patients to stay connected with the world around them, stay stimulated and independent for longer.¹¹

Finally, fall prevention should be addressed in elderly management care plans. Falls are common in older people and have a direct link to visual impairment, especially related to climbing stairs and steps.¹² While falls in older people are multifactorial, there is clear evidence that they are associated with well-defined intrinsic and/or extrinsic factors, some of which can be minimised through targeted interventions to reduce the risk of falls. ECOO has published guidelines for Optometrists and Opticians on how to best manage their older patients to minimise the risk of falls.¹³

One additional challenge is to ensure regular eye screenings within elderly home healthcare institutions by adequately trained ophthalmic personnel, as many of frail elderly home healthcare patients do have an ophthalmological condition which affects their eye-sight.

In the spirit of a life-cycle approach, eye checks and awareness of the importance of good vision and eye health needs to start at an early age so as to ensure the best outcome for all age groups.

We are looking forward to being in contact with you on this matter and will be delighted to provide you with further information and references as needed.

Yours sincerely,

Cindy Tromans
ECOO President

Michael Hodin
CEO of the GCOA

Wolfgang Gindorfer
IAPB Europe Regional Chair

⁹ RNIB. Sight loss patients with depression "routinely overlooked". 15th February 2016. Available at: <https://www.rnib.org.uk/nb-online/sight-loss-patients-depression-routinely-overlooked#:~:text=According%20to%20the%20Depression%20in,any%20health%20condition%20or%20disability>

¹⁰ WHO, Sept 2020, <https://www.who.int/news-room/fact-sheets/detail/dementia>

¹¹ Bowen.M.,et al, 2016, The Prevalence of Visual Impairment in People with Dementia (the ProVIDE study): a cross-sectional study of people aged 60-89 years with dementia and qualitative exploration of individual, carer and professional perspectives

¹² Elliott.D.B.,2012, Falls and vision impairment : guidance for the optometrist, Optometry in Practice, Vol 13,issue 2, 65-76.

¹³ Guidelines "How opticians and optometrists can help prevent falls in older patients"

<https://www.ecoo.info/wp-content/uploads/2020/01/Guidelines-to-Help-Prevent-Falls-in-Older-Patients-January-2020.pdf>