

**JOINT OPTICAL COMMITTEE ON EUROPEAN UNION
(JOCEU)**

**Response to Public Consultation
on
Preparation of a European road safety action programme 2011-2020
November 2009**

JOCEU is the British section of the European Council of Optometry and Optics (ECOO). The European Council of Optometry and Optics is the confederation of national bodies representing optometrists and opticians in 30 European countries.

JOCEU is concerned that the proposed European road safety programme does not refer to the medical condition of drivers; nor does it address the importance of physical fitness in driving competence, in particular drivers' vision and the adequacy of their eyesight.

This topic overlaps with the EU's directive on driving licences. Our profession has concerns about how this directive may be implemented in the United Kingdom. JOCEU hopes that the implementation of the directive will be used as an opportunity to improve the safety of drivers with respect to vision.

The current method of determining a driver's visual standard in the UK came into effect in 1935. At this time, there were far fewer road users, and substantially fewer vehicles in the road. The method of measuring a driver's visual standard is difficult to replicate in a clinical setting; it is unscientific and has poor repeatability. Furthermore, drivers have a poor understanding of the required visual standard. They are not good at assessing their own vision. Many do not wish to inform the authorities, if their vision does not meet the required visual standard.

The Department of Transport in the UK has stated that it is cautious about changing the current method determining drivers' visual standards, because (according to the Department) it is difficult to link vision and accidents. JOCEU refutes this position, on the following grounds:

- It is intuitive that a driver's good standard of vision improves the ability to see the road and obstacles and improve response times.
- Furthermore, how can vision ever be linked to accidents, if it is rarely measured? The Police Service in the UK rarely checks drivers' vision at the scene of an accident, because it is not a "primary objective".
- Finally, there is research that supports that vision and road safety are linked. Glare sensitivity and visual fields (also termed useful Field of View) have all been shown to affect the ability to drive, and be related

to accidents. In the USA, research has shown that those involved in accidents are 8 times more likely to have poor contrast sensitivity (the ability to see objects that are shades of grey under conditions of low contrast or dim lighting) in their worse eye than accident-free drivers. Glaucoma, age-related macular degeneration and cataract all affect contrast sensitivity. Another study in the USA has shown that those who elect not to have cataract surgery are two times more likely to be involved in an accident than those who have had surgical treatment.

JOCEU does not wish to prohibit people from driving. It recognises the importance of driving with regard to the population's social, personal and mobility. However, we wish to encourage a better understanding of vision and eye health, because we believe it will lead to increased road safety - and that, after all, is the European Commission's target in its document "A Safer Way: Consultation on Making Britain's Roads the Safest in the World."

JOCEU is not suggesting that the problem of vision and driving will be resolved by necessarily making the vision standard for driving any more stringent (and thus failing those that would be acceptable to drive). Rather, JOCEU favours the putting in place of safeguards to ensure that drivers are visually tested, wear a refractive correction for driving if necessary, and that such criteria are periodically checked.

For further information, please contact:

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