



Subject: Recommendations to consider in the European Commission’s evaluation of the Directive 2006/126/EC on driving licenses (consultation process Oct. 2020-Jan. 2021).

Dear Sir/Madam,

We are writing to you as a coalition of stakeholders, united by a common goal to reinforce the importance of good vision for safer mobility in Europe. Further, we propose an amendment of Directive 2006/126 on driving licenses (henceforth Directive 2006/126) to highlight the role of good vision in road safety and the importance of improving the visual requirements that are currently contained in Annex II and III of the Directive.

For background, the third Global Ministerial Conference on Road Safety, held in Stockholm in February 2020, culminated in the forward-looking “Stockholm Declaration,” and calls for a new global target to reduce road traffic deaths and injuries by 50% by 2030.

Following the Stockholm declaration, the Inland Transport Committee (ITC), the United Nations’ regulatory platform in the field of inland transport, made recommendations for “Enhancing National Road Safety Systems,” which came into effect on April 1, 2020. This recommendation represents a major guideline towards road safety across the globe, including Europe, and particularly calls countries to adopt specific rules **to ensure good vision for all road users** as an important lever to achieve this goal.

Indeed, **up to 90% of the information needed to make safe decisions on the road comes through our eyes; therefore, good vision is a critical factor for the safety of drivers, bikers, cyclists and pedestrians of all ages.** With this background, our coalition gathers leading global and regional stakeholders who are involved in many complementary efforts behind Vision and Road Safety:

- **Essilor International**, world’s leading ophthalmic optics company driven by its mission “improving lives by improving sight”. Since its partnership with the FIA in 2017, Essilor has been deeply engaged in global efforts for safe mobility and reinforced its commitment joining the [United Nations Road Safety Fund](#), emphasized through an interview between [Jean Todt and Paul du Saillant](#).

- **Vision Impact Institute (VII)**, a global non-profit organization committed to raising awareness about the importance of vision correction and protection for safer roads, providing evidence for advocacy and hosting a unique research database at visionimpactinstitute.org.

- **Fesvial**, the Spanish Road Safety Foundation, in close relation with the University of Valencia (Spain) and INTRAS (Traffic Research Institute), published in January 2021, [a position paper, providing global studies evidence](#) that *vision should not be ignored anymore and recommendations for immediate action in road safety policies* .

As a coalition, we would like to emphasize the need to amend the current Directive on three critical points:

1. Awareness about “the importance of good vision for road safety” in Europe.

The current directive **Annex II paragraph I**. “Minimum requirements for driving tests,” Article 2 stipulates the “content of the theory test concerning all vehicle categories.” However, “good vision” and its importance for safer driving are not mentioned explicitly. In addition, **Annex II, Paragraph II**. “Knowledge, skill and behavior for driving a power

driven vehicle” stipulates the need to “take account of all the factors affecting driving behaviour (e.g. alcohol, fatigue, **poor eyesight**, etc.) so as to retain full use of the faculties needed to drive safely.”

Therefore, we recommend:

> **adding a chapter about the importance of good vision for drivers**, explaining the risks of uncorrected poor vision when driving night and day (update the Article 2.1.2 in the Directive)

> and **advising Member States to** incorporate a specific awareness module in Driver’s Manuals, driving theoretical learning books and instructors books (already a standard in Spain). The updated content should mention the FIA golden rules, including the rules focused specifically on vision: i. Check your vision regularly. ii. Protect your eyes from glare. iii..Wear your glasses on the road.

2. Assessment of vision for driving licences across Europe.

The **Annex III** “Minimum standards of physical and mental fitness for driving a power driven vehicle,” **Articles 6 and 6.1** state that “All applicants for a driving licence shall undergo an appropriate investigation to ensure that they have adequate visual acuity for driving power-driven vehicles.”

The measurement of visual acuity, as set out in Annex III, is a core established measure of visual function, a number of EU Member States still use Licence Plate Test, which does not measure visual acuity and is not carried out in standardized conditions. In any case, the European Level has validated no protocol for eye check for drivers.

Therefore, we recommend:

> including **an amendment on the visual assessment** that should be done with a “**proper visual test - namely Acuity Test - instead of licence plate test, to be performed by an appropriately trained and qualified eye care professional for all driving licenses**”

> further, we would propose **the settlement of a task force** coordination at EU level to define the appropriate eye check protocol for licenced drivers.

3. Assessment of vision for the renewal of the driving licences across Europe.

In parallel, the same request is proposed for the renewal of driving licences as mentioned in the **Article 9 of the Directive**. Vision continues to change over a person’s lifetime. As people age, visual problems such as myopia, presbyopia, cataract, or other eye conditions can affect vision efficiency when driving both day and night.

Therefore, we recommend:

> **Applying a visual assessment** by an appropriately trained and qualified eye care professional **for all renewals** of driving licenses.

We remain at your disposal for any questions or clarifications you may need.

Yours sincerely,

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