



## **Report on Driver Vision Screening in Europe**

June 2011

### **Executive Summary**

The EU has recently published Directives in order to standardise driving licences and harmonise requirements. Currently the visual requirements to obtain a driving licence differ substantially across Member States and non EU Countries. This report provides information regarding the status of driver vision screening in 26 European countries. A number of countries in Europe (including EU Member States) are not assessing drivers to the minimum recommendations contained within the EU legislation. The majority recognise the importance of good vision for safe driving and go above the basic requirements from the Directives, for example by introducing systematic assessment of vision during the driving career, and this good example should be followed by all.

If greater progress to harmonise the visual requirements for Group 1 (car and motorcycle) drivers is not made, the EU should press Member States to meet the recommended standards under Directive 2009/113/EC. If this is unsuccessful, the option of reviewing the visual requirements in the Driving Licence Directives should be revisited.

### **Introduction**

The EC Directives on Driving Licences are currently being implemented in the EU Member States.<sup>1</sup> The goal is to harmonise the underlying standards and systems of driver licensing across the EU. The 2006 Directive set a deadline of January 2011 for Member States to report their plan for implementation to the European Commission. The 2009 Directive updated the minimum visual requirements that drivers should meet in order to drive safely, and set a deadline of August 2010 for implementation. A summary of the visual requirements under 2009/113/EC is reproduced in Annex 1.

ECOO, EUROM I and EUROMCONTACT are committed to improving eye health and vision in Europe, and one of our main objectives is to achieve better screening of drivers' vision across the EU, with a view to improving road safety. The European Council of Optometry and Optics (ECOO) represents the 75,000 optometrists, opticians and optical retail outlets

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<sup>1</sup> EC Directives 2006/126/EC and 2009/113/EC

across Europe.<sup>2</sup> EUROM I represents the national associations of manufacturers of corrective lenses, frames, and instruments for opticians (700 companies).<sup>3</sup> EUROMCONTACT represents the national associations and the international manufacturers of contact lenses and contact lens care products.<sup>4</sup>

ECOO, EUROM I and EUROMCONTACT have for some time been concerned that a number of Member States are not meeting the minimum requirements from the Directives and have surveyed their national members to review the situation across the EU and other European countries.

## **Optical Bodies Position on Driving and Vision**

ECOO, EUROM I, ECFLIN and EUROMCONTACT published a joint position paper in May 2010 which outlined that eyesight can play an important role in improving road safety. The same report recommended mandatory assessments of vision as part of licence renewal.<sup>5</sup>

ECOO also published an updated position paper with specific recommendations for successful implementation of the visual requirements under the directives.<sup>6</sup> The position paper concluded that for Group 2 (heavy goods and passenger transport vehicle) drivers, Directives 2006/126/EC and 2009/113/EC should ensure systematic and ongoing assessment of vision throughout their driving career.<sup>7</sup>

Both position papers raised questions about the range of practice of assessing Group 1 (car and motorcycle) drivers. To analyse the extent of this variation, a survey of practice across a range of European countries was undertaken.<sup>8</sup> ECOO and EUROM I surveyed their national delegates in March 2011. A list of the questions asked is available in Annex 2. The questions analysed how vision was assessed in each country, by whom, and how frequently, in particular for Group 1 drivers. The results are reproduced in the following sections.

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<sup>2</sup> [www.ecoo.info](http://www.ecoo.info)

<sup>3</sup> [http://www.eurom.org/index.php?option=com\\_content&task=view&id=5&Itemid=5](http://www.eurom.org/index.php?option=com_content&task=view&id=5&Itemid=5)

<sup>4</sup> <http://www.euromcontact.org/>

<sup>5</sup> ECFLIN ECOO EUROM I EUROMCONTACT (2010) Position Paper on the European Driving Licence (available on request)

<sup>6</sup> ECOO (2010) Position Paper on Driving and Vision [http://ecoo.info/mm/ECOO\\_Position-Paper\\_Vision-and-Driving.pdf](http://ecoo.info/mm/ECOO_Position-Paper_Vision-and-Driving.pdf)

<sup>7</sup> Group 2 drivers include HGV and passenger transport vehicles (Classes C1-DE)

<sup>8</sup> Group 1 drivers include cars and motorcycles (Classes AM-BE)

## Initial Eyesight Assessment

Directive 2009/113/EC specifies that Group 1 applicants for a first driving licence should have an ‘appropriate investigation of vision to ensure they have adequate visual acuity for driving’ and ‘where there is reason to doubt an applicant’s vision is adequate, he or she will be examined by a competent medical authority’.<sup>1</sup> National delegates were asked to provide details of the type of initial assessment of vision, prior to issuing a first licence. The results are reproduced in Table 1.

**Table 1: Initial Eyesight Assessment for Group 1 (before issuing first licence)**

Assessment Type	EU	Non EU
<b>Visual Acuity and Visual Field plus other assessments of visual function</b>	Austria Ireland Portugal Spain	Serbia Turkey
<b>Visual Acuity and Visual Fields only</b>	Denmark Estonia Finland Latvia Poland Slovakia Sweden	Croatia Switzerland
<b>Visual Acuity only</b>	Germany Greece Hungary Italy Slovenia	
<b>Licence Plate Test</b>	Cyprus France Netherlands UK	Norway

The results in Table 1 indicate that there is a range of activity undertaken in EU Member States when assessing Group 1 drivers’ vision in advance of issuing a first licence, and this divergence in activity has not closed following the updated Directives.

A majority of countries assess at least visual acuity and visual fields as part of their initial assessment of vision, prior to issuing a first driving licence. ECOO, EUROM I and EUROMCONTACT believe this is best practice when assessing drivers’ vision, as it underlines the importance of always driving with good vision. Some countries go further in requiring additional assessment, for example in Austria and Spain a driver is required to have an eye examination by an ophthalmologist in advance of issuing a first licence. In Ireland the driver attends for an assessment of visual acuity (VA), visual fields (VF), diplopia (double vision)

and other visual functions that can compromise safe driving. In Portugal drivers are required to have an assessment of their colour vision alongside VA and VF.

Five countries only require an assessment of visual acuity, on a Snellen chart or equivalent. Although this includes Greece, if the performer suspects there might be a problem, the driver is required to have an additional assessment of visual fields and colour vision.

Another five European countries rely on the Licence Plate Test as their sole assessment of vision. ECOO, EUROM and EUROMCONTACT believe this practice is unacceptable as the Licence Plate Test is not performed under controlled conditions, and the results are not directly comparable with the underlying European standards which specify an assessment of visual acuity.

### Who Performs the Initial Eyesight Assessment?

The EC Directive states that the assessment of visual acuity (Group 1) should be performed by a competent authority. National delegates were asked to provide details of who performs this initial assessment, and the results are produced in Table 2.

**Table 2: Who Performs the Initial Eyesight Assessment (Group 1)**

Origin	Medical Doctor	Ophthalmologist	Optometrist/ Optician	Any of the Above	Driving Test Employee
EU	Denmark Finland Italy Poland Portugal Slovakia Slovenia	Austria Denmark Finland Greece Hungary Latvia Slovakia Spain	Austria	Estonia Germany Ireland Sweden	Cyprus France Netherlands Sweden UK
Non EU		Croatia Serbia Switzerland Turkey	Switzerland		Norway

In practice in most European countries the person assessing a driver’s vision is a medical practitioner, ophthalmologist, optometrist or optician.

Interestingly, six countries reported that the assessment of vision is performed by a driving test centre employee, who performs the Licence Plate Test in five of these countries (see Table 1). In Sweden a (non-medical) driving test employee can perform visual acuity and visual fields assessment, if they have completed a training course.

ECOO, EUROM I and EUROMCONTACT believe that assessments of drivers' vision (visual acuity and visual fields) should be carried out by a competent authority that understands the assessment, reasons for failure and can discuss potential solutions with those who fail the assessment. In order to deliver the best choice, access and value for drivers, ECOO, EUROM I and EUROMCONTACT believe that it is most appropriate for medical practitioners, ophthalmologists, optometrists and opticians to perform the assessment, subject to not conflicting with pre-existing national legislation for these professions.

### **Reassessment of Drivers' Vision**

Vision regularly changes with age. Many drivers do not notice a gradual change in their visual status (whether visual acuity, visual field or other visual functions), and can therefore be unaware that they fall below the required standard. Studies have shown a widespread lack of awareness about the current visual standards and the legal implications of driving with poor vision.

ECOO, EUROM I and EUROMCONTACT are concerned that there is no requirement in the Directives for ongoing assessment of Group 1 drivers' vision on renewal. This is in contrast with Group 2 licence holders who require an assessment to be performed every five years when renewing their licence.

It should also be noted that the distinction between Group 1 and Group 2 drivers has blurred in the modern economy. Couriers, taxi drivers, and many sales people all effectively drive for a living, and there has been a significant rise in long-distance commuting. These are all classified as Group 1 drivers, yet many spend at least as much time driving as those classified as Group 2 (or traditionally vocational drivers), and should therefore be subject to similar assessments of vision.

Due to the importance of driving with good vision and as stated above, given that vision changes with age, a majority of Member States already require a further assessment of vision by a competent professional, which is outlined in Table 3.

**Table 3: Reassessments of Vision Later in Driving Career (Group 1 only)**

Country	Yes (Age and Regularity of Test)		No Requirement
EU	Cyprus	70 (visual acuity & visual fields by ophthalmologist)	Austria France Germany Hungary Sweden UK
	Denmark	70, again at 74 then every 2 years	
	Estonia	Every 10 Years (at licence renewal) From 65 every 5 years	
	Finland	45 (visual acuity by optometrist) again at 70 and every 5 years	
	Greece	65 every 3 years	
	Ireland	At every licence renewal for spectacle wearers. Otherwise at age 70, then every 3 years (but can be more frequent)	
	Italy	Every 10 Years 50 every 5 years, 70 every 3 years, 80 every 2 years	
	Latvia	Every 10 years 50-65 every 5 years, 65 every 3 years	
	Netherlands	70 then every five years (but can be more frequent if an eye condition is present)	
	Poland	Non-permanent licences are issued for certain visual conditions (specific spectacle prescriptions or after surgery) with an assessment every 1-5 years Otherwise at age 75	
	Portugal	60 (by medical practitioner)	
	Slovakia	60 every 2 years, 70 every year	
	Slovenia	Can be every 1-5 years if an eye condition is present Otherwise, age 80	
Spain	Every 10 Years 65 every 5 years		

Country	Yes (Age and Regularity of Test)		No Requirement
Non EU	Croatia	80 every 2 years (visual acuity and visual fields by ophthalmologist)	Norway
	Serbia	When renewing a licence For everyone from age 60, then every 1-10 years depending on eye health	
	Switzerland	70 (changing to 50)	
	Turkey	Every 10 Years up to age 50 50-65 every five years 65+ every three years	

The results in Table 3 reveal that there is a range of activity across Europe and within the EU when assessing Group 1 drivers' vision after their first licence is issued. Best practice is found in countries such as Estonia, Italy, Latvia, Serbia, Spain, and Turkey, which require regular assessments of vision during the driving career. A sizable majority of countries require at least one documented assessment of vision performed by a competent professional, with documentation submitted as part of licence renewal. By contrast, there is no requirement for a further assessment of vision for Group 1 in Austria, France, Germany, Norway, Sweden and the UK. In the UK drivers are expected to self-assess that their vision meets the standards, and to state that they meet the standards at three-year intervals from the age of 70.

ECCO, EUROM I and EUROMCONTACT believe that all drivers should have their vision reassessed during their driving career, and drivers cannot be expected to self-assess their vision against the detailed and technical requirements of the Driving Licence Directives. All EU Member States should adopt a documented reassessment of vision as part of licence renewal for Group 1 drivers, as is already done in Estonia, Italy, Latvia, Spain and Turkey.

### **Cost of Driver Vision Screening**

There is a range of fees paid by drivers to have their vision screened. In most countries the fee seems to be linked to the number and type of assessment performed. In Germany the fee to have visual acuity assessed is set by the government at €6.43. The highest fees reported were in Greece where the fee is €45 to have visual acuity assessed, and Hungary where the fee is €52 if the assessment is performed by an ophthalmologist.

This cost should be considered in the context of the overall cost of motoring. In Germany for example the fee is paid only when applying for a first licence. Should a reassessment of

vision be required for licence renewal, the cost would be payable at certain intervals as part of licence renewal (see Table 3 for details).

## **Conclusion**

The 2006 and 2009 EU Driving Licence Directives continue a long path to harmonise driving licences with the overall aim of improving road safety and facilitating enforcement.

This survey demonstrates that there is a wide range of systems to assess drivers' vision across the EU and other European countries. This divergence has not reduced or closed in those countries that have already completed the implementation of the 2009 Directive. Moreover there are signs that divergence in the standards of visual assessment is increasing.

ECOO, EUROM I and EUROMCONTACT believe that European countries could do substantially more to improve their system of assessing drivers' vision, in particular the EU Member States that continue to assess visual acuity by using the Licence Plate Test, and those that require no further assessment of vision for Group 1 drivers. We would welcome the support of the European Commission and Members of the European Parliament to ensure that steps are taken to address this issue in the immediate future. If Member States are unwilling to act on this important issue, we strongly recommend that the European institutions revisit the underlying visual requirements in the Directives.



### **Visual Requirements for Drivers under Annex III EC Directive 2006/126/EC<sup>9</sup>**

Annex III EC Directive 2006/126/EC as amended by 2009/113/EC sets out the minimum standards of physical and mental fitness for driving. These minimum standards will need to be met by all Group 1 drivers when applying for a first licence or its renewal. Renewals under the 2006 Directive will be every ten years for Group 1 drivers (or a maximum of fifteen years).

“All applicants for a driving licence shall undergo an appropriate investigation to ensure that they have adequate visual acuity for driving power-driven vehicles. Where there is reason to doubt that the applicant’s vision is adequate, he shall be examined by a competent medical authority (Annex III 6.0)”.

Group 1 (Annex III 6.1 and 6.2) drivers require adequate visual acuity and visual fields for driving power-driven vehicles; and they should be investigated appropriately when applying for a licence and on renewal. Directive 2009/113/EC defines a minimum visual acuity of 0.5 (6/12) binocular with corrective lenses if necessary. There is a clearly stated recommendation for a visual field of at least 120 degrees; and the extension should be at least 50 degrees to the right and 50 degrees to the left and 20 degrees up and down. No defects should be present within a radius of the central 20 degrees (Annex III 6.1).

Group 1 drivers with total functional loss of sight in one eye or who use only one eye must have this condition of monocular vision assessed by a competent medical authority. Monocular drivers must have a visual acuity of at least 0.5 (6/12) with corrective lenses if necessary, and a field of vision in that eye equivalent to the requirement in paragraph 6.1. A competent medical authority must certify that monocular vision has existed for sufficiently long to allow adaptation and that the field requirements are met (Annex III 6.2).

Group 2 (Annex III 6.4) drivers require visual acuity of at least 0.8 (6/7.5) in the better eye and 0.1 (6/60) in the worse eye, with corrective lenses if necessary. If corrective lenses are needed to attain values of 0.8 and 0.1 the minimum acuity must be achieved either by correction by means of glasses with a power not exceeding plus or minus 8 dioptres or with the aid of contact lenses. This correction must be well tolerated. The horizontal visual field should be at least 160 degrees, the extension should be at least 70 degrees left and right and 30 degrees up and down. No defects should be present within a radius of the central 30 degrees. Driving licences shall not be issued to or renewed for applicants or drivers suffering from impaired contrast sensitivity or from diplopia. Group 2 drivers require this assessment every five years on renewal of their licence (all from Annex III 6.4).

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<sup>9</sup> All references from Annex III EC Directive 2006/126/EC as amended by 2009/113/EC

## ECOO and EUROM I Questionnaire to Members on Driving and Vision

Dear Member,

As you are aware we have been lobbying for improvements to the assessment of drivers' vision during the implementation of the Driving Licence Directive. We need your help to collect some information about the situation in your country so that we can present a pan-European analysis to the European authorities.

We would be most grateful if you could please take the time to respond to the questions below. If possible, could we have your response before Friday 4<sup>th</sup> of February please?

Please send your response by email to Mark Nevin [mark@fodo.com](mailto:mark@fodo.com)

### Your details

Name of organisation:

Name of person completing below:

Contact details (email):

Applicable country:

### Please Answer Questions Below

Questions 1-7 below are applicable to Group 1 licence holders only (basically car and motorcycle drivers).

1. Is there a requirement for a medical check when applying for a first driving licence in your country?
  - a. No requirement
  - b. Medical Declaration (or statement) signed by applicant (only) that he/she is fit to drive
  - c. Medical Declaration (or statement) countersigned by a Medical Practitioner
  - d. Other \_\_\_\_\_

2. What type of eyesight assessment is performed when applying for a first licence?  
Please give details.
- a. Licence Plate Test only
  - b. Visual Acuity
  - c. Visual Acuity and Visual Fields
  - d. Full Sight Test or Eye Examination
  - e. Other or None of the Above \_\_\_\_\_

3. Who performs the eyesight assessment in Question 2?
- a. Medical Doctor
  - b. Ophthalmologist
  - c. Optometrist/Optician
  - d. Any of the Above
  - e. Driving Test Centre Employee
  - f. Other \_\_\_\_\_

4. After the driver is issued with a full driving licence, is there a subsequent assessment of the drivers' vision, if so, how frequently, at what age(s) and by whom?

For example: At the age of 45 the Group 1 driver has an assessment of visual acuity and visual fields by an optometrist or medical practitioner. Please note that in some countries there may be no further assessment of vision. Please give details below

5. What is the cost of a driving eyesight assessment in your country (or eye examination if appropriate)?
6. Has implementation of the EU Directives (2006/126/EC and 2009/113/EC) been completed yet?

7. Has there been a change with respect to driving eyesight assessment during implementation of the same Directives, or are you expecting any changes? Please give details.
8. Group 2 or professional drivers will be required to have a mandatory medical assessment under the new Directives, which will include an assessment of vision. In your country, do optometrists assess the vision of Group 2 drivers (heavy goods vehicles and passenger transport over 10 people)? Please give details.