

Your opinion on the Single Market Act

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intro	
Please provide us with some information about yourself	
Are you replying as:	Organisation
Type of organisation	Industry federation
Is your organisation registered in the Commission's Interest Representative Register ?	Yes
If you are a Registered organisation , please indicate your Register ID number	
03999415319-19	
Name of the organisation you represent	
European Council of Optometry and Optics	
Country	
Belgium	
E-mail	
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Questions	
1. What is your overall assessment of the Single Market Act?	Positive
Additional explanation	
<p>We welcome the expansion and deepening of the Single Market which will hopefully help to realise a higher growth potential for the EU. Within optometry and optics, the manufacturing sectors have moved generally to being pan-European operators, and a number of optical retail businesses have also moved in that direction. Optics is generally highly competitive and patients as consumers have good access to quality and choice and an increasingly wide range of price options. Patients and consumers generally express a high level of satisfaction with eye care and optical services. Although in our experience, patients tend to prefer to source their eye healthcare locally to where they live or work, we also support the recent Patients' Rights Directive which we expect will also assist patients and consumers if they seek eye care services and products outside their Member State. Within optics we have also encouraged the harmonisation of skills and qualifications with a specified education programme which aims to facilitate the movement of qualified professionals between countries. The sector is also moving up the skills ladder and seeks to continue to do so to offer better choices to patients. At the same time, as employers, our vocational training schemes provide a route out of low skills, low pay work</p>	

and up the career ladder into the professional sphere. As a sector we fully subscribe to high standards of patient and consumer protection, standards, access and choice.

2. The Single Market Act proposes [50 actions](#): please indicate the actions you consider to be the most important (up to 10 choices possible)

1. EU Patent
3. Counterfeit and piracy
6. Standardisation
33. Recognition of professional qualifications
34. Student mobility
13. Small Business Act review
20. VAT
48. Consultation and dialogue with civil society

If you wish, you can state the reason for your choice

ECOO represents optical professions and optical practices from 30 countries across Europe. We have selected the above on the basis of our current projects that seek to harmonise the optical profession and on the basis of those initiatives which we expect to reduce bureaucracy and allow our businesses to devote more time to delivering care to patients. We also have concerns about counterfeit products and inappropriate deregulation which puts patients at risk especially in the areas of powered and plano contact lenses.

3. Does the Single Market Act propose appropriate measures to address the issues/challenges that are identified?

Yes

Additional explanation

We believe that the proposed Agenda is already very ambitious and, if many more measures were included, we fear that this would reduce the focus on delivery.

4. Are there any other issues you consider should be addressed in the Single Market Act in the chapter on "Strong, sustainable and equitable growth for business"?

Yes

Which ones?

We would make the point that in some areas, for example in healthcare, there might be a good reason for the existence of national regulations which are designed to ensure consumer and patient protection, as recognized by several decisions of the Court of Justice (e.g. Ker Optika 2010, C-108/09). We would advocate that where national regulations are proportionate and designed to protect consumers and patients rather than to restrict choice, they should continue to be permitted. We would also wish for decisions on national regulations of this nature to continue to be made by Member States' authorities.

5. Are there any other issues you consider should be addressed in the Single Market Act in the chapter on "Restoring confidence by putting Europeans at the heart of the single market"?

Yes

Which ones?

In our view there should be a clearer link between the market and the public health and social advancement agendas. Good eye care for children, for example, is essential for social and educational achievement and integration. Equally reducing the level of avoidable visual impairment should be a major social and public health goal. Europeans need to be reassured that their Single Market is designed to put their health and welfare, as well as their economic wellbeing and prosperity, at the heart of everything we do. We would like to add that we look forward to further engagement and working with the European Commission on the Single Market Act. We would be happy to meet with the Commission to discuss any of these topics in further detail.

6. Are there any other issues you consider should be addressed in the Single Market Act in the chapter on "Dialogue, partnership, evaluation: the keys to good governance of the single

No

market"?