



European Council of Optometry and Optics
Conseil Européen de l'Optométrie et de l'Optique
Europäischer Rat für Optometrie und Optik

ECOO contribution to the European Commission consultation on Artificial Intelligence

The European Council of Optometry and Optics (ECOO) is pleased to submit a contribution to the public consultation launched by the European Commission on its [White Paper on Artificial Intelligence](#).

As the European organisation representing the interests of optometrists and opticians from 24 countries, ECOO aims to promote eye health to the public across borders and to harmonise clinical and educational standards of optometric and optical practice throughout Europe.

We acknowledge that Artificial Intelligence (AI) will play an increasingly significant role in the way healthcare providers care for their patients in the clinic, with potential for earlier, more accurate and more uniform diagnosis for eye diseases. However, within the scope of this White Paper, we would like to underscore that healthcare providers and healthcare practitioners must work together with Member States and other stakeholders to resolve ethical and practical concerns around AI in healthcare and ensure populations reap the full benefits of AI. Collaboration between innovators and practitioners will hold the key in scaling AI in European healthcare and delivering a quality standard of care for patients.

We firmly believe that any future regulatory framework on AI, especially high-risk applications such as healthcare, should:

- As of early stages, consult with and involve professional bodies in the decision-making process to determine the challenges and impact AI might have on different professions.
- Consider frame AI-based systems in healthcare practice as an aid or a complementary tool, as healthcare professionals need to continue being the decision-makers of how patients should be further referred for care.
- Emphasise the need of involving healthcare providers in the design of AI systems, in order to ensure quality and address questions about the robustness and accuracy of AI systems, especially with regards to patient safety and professional liability – in particular, practitioners will need to understand how the AI solution works in order to perform their own clinical decision-making.
- Underline the need for AI systems to undergo proper clinical trials, testing and regulatory approvals – AI solutions need to show clinical evidence of quality and effectiveness, with stringent data proving that the system does not harm patient safety.

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As a complement to the scope of this White Paper, we would like to highlight three additional areas on how AI systems will challenge the healthcare practice: skills, scope of practice and reimbursement systems. There will be a potential need for new digital skills or upgrading clinical training for healthcare providers and practitioners in order to work with AI systems, which will require both time and resources. Furthermore, AI has the potential to accentuate the diverse scope of practice for practitioners across Europe (in any field, and in eye care in particular), as well as challenge the current funding and reimbursement system for provision of care.

We thank the European Commission for the opportunity to contribute to the consultation, and look forward to engaging on this topic further.

Kind regards,

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