Department for Transport Motorcycle Test Review

Joint Response from the Optical Confederation and the College of Optometrists

The Optical Confederation is a coalition of the professional and representative optical bodies, including the Association of British Dispensing Opticians, the Association of Optometrists, the Association of Contact Lens Manufacturers, the Federation of Manufacturing Opticians and the Federation of Ophthalmic & Dispensing Opticians. Together they represent 12,000 optometrists, 6,000 dispensing opticians over 7,000 optical practices, as well as lens, spectacle and optical equipment manufacturers. The College of Optometrists is the professional, scientific and examining body for optometry working for the public benefit.

We welcome this review of the motorcycle test and welcome the opportunity to be able to comment on how the current test could be improved and brought into line with measures contained in the European Directives (2006/126/EC as amended by 2009/113/EC) on driving licences. Our comments are specifically in relation to vision standards and the assessment of drivers and motorcyclists against those standards. We are also calling for the same changes to be adopted for car drivers.

We are concerned that the current method of assessing motorcyclists’ eyesight is outdated, unscientific, unfair and does not fully meet the requirements of the Directives. We believe that the current system of using a number plate at a distance of 20 metres to assess visual acuity is inadequate for a number of reasons which we have listed below. We are also concerned that placing the responsibility on the motorcyclist to self-report when they believe their eyesight no longer meets this requirement, is also severely flawed. We believe that all drivers and motorcyclists should be treated equally with regard to assessing their eyesight. Currently in the UK only professional drivers (Group 2 drivers) are required to undergo vision screening which checks their visual acuity and visual fields. If they do not meet the standards for visual acuity and visual fields they are referred for a sight test which includes a broader assessment of a person’s vision and eye health. We believe that to recognise the importance of vision screening for one group of drivers and not all drivers and motorcyclists is inconsistent and illogical.

Inadequacies of the current system of assessing motorcyclists’ vision:
Many drivers and motorcyclists do not notice a gradual change in their vision (whether visual acuity or visual field), and are therefore unaware that they fall below the required standard. According to the International Glaucoma Association, a person can lose up to 40% of their vision before they realise they have a problem with their eyesight.

The test to read the number plate is not scientifically based and does not reflect today’s knowledge of vision and how it affects driving. It is not standardised nor validated, meaning that the results are not repeatable or consistent. This makes it an inappropriate method of determining whether a person has adequate vision for driving.

The number plate test can be affected by environmental conditions. People can fail the test in different lighting or weather conditions. In unfavourable conditions, individuals may fail the test, even though their vision would fulfil the requirements of the Directive. In favourable conditions others may pass, even though their vision would not fulfil the Directive’s requirements and the person may benefit from wearing glasses or contact lenses while driving a car or motorcycle.

Self-reporting is reliant on all drivers and motorcyclists knowing the required standard (the vast majority do not), realising they do not meet it, and being aware that it is a criminal offence not to notify the DVLA if they have a problem with their eyesight. We believe that very few drivers either understand the standard or the implication for them if they do not meet it.1 2 3 4 5

The current system has been in place since the 1930s and has not been updated since to reflect greatly increased numbers of vehicles on the roads, greatly increased driving speeds or developments in road safety standards and clinical advancements.

A number of scientific publications have questioned the accuracy and reliability of the number plate test. Charman (1997) calculated from angular subtense that the number plate test was in fact equivalent to a Snellen acuity of approximately 6/15 i.e. below the 6/12 standard detailed in the Directive6. The Snellen chart is a letter chart used by eye care professionals and others to measure visual acuity. Other publications have found the number plate test to be inconsistent with Snellen acuity, results were variable and unlikely to be repeatable7 8.

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2 Taylor (1997) Accuracy of recall of the legal number plate testing distance by UK drivers Ophthalmic & Physiological Optics vol 17 p 473-477,


4 Box, Gandolphi & Mitchell (2010) Maintaining safe mobility for the ageing population. RAC Foundation

5 Pointer (2007) Poor recognition of the UK minimum driving vision standard by motorists attending optometric practice Ophthalmic & Physiological Optics vol. 27 p238-244,


Recent reports have shown that there is reluctance amongst drivers to admit that they do not meet the standards. The RAC Foundation\(^9\) published a report in April 2010 which stated that “when first applying for a driving licence individuals are required to state their medical conditions. All drivers must inform the DVLA of any change in their health, although the evidence is that motorists do not tend to contact the authorities with this information. This is because motorists either have a lack of knowledge about how or when to provide the update or because many fear the impact it might have on their ability to hold a licence. It is only at age 70, when a reminder application form is issued, that drivers are required by law to state their medical conditions and fitness to drive.”

For all of the above reasons, the current system of checking drivers and motorcyclists’ eyesight cannot claim to be sufficient to meet the harmonised European standards for drivers’ vision under Directive 2006/126/EC as amended by 2009/113/EC. States such as Germany, Ireland and Finland use a Snellen acuity based drivers’ vision screening system which complies with the Directives. The implementation of the stated Directives provides an important opportunity for the UK Government to improve the current system and to ensure all drivers (including motorcyclists) are not needlessly risking injury to themselves or others.

We would therefore recommend the following:

1. The licence plate test should be scrapped and replaced with an appropriate Snellen based assessment conducted by a competent authority that properly understands this assessment and the impact on drivers that fail.

2. Group 1 drivers (cars and motorcyclists) should have their vision screened when renewing their licence to ensure that all drivers continue to meet the visual requirements from the Directives. This should include an assessment of visual fields, especially among older drivers.

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\(^{9}\) Box, Gandolphi & Mitchell (2010) Maintaining safe mobility for the ageing population. *RAC Foundation*