

Comments on

Bill C-284 for the Social Affairs, Science and Technology Committee of the Senate of Canada

Summary

The Alliance for Equality of Blind Canadians (AEBC) endorses Bill C-284, however, it needs to be strengthened by:

- Defining vision rehabilitation, ensuring that vision loss rehabilitation is included.
- Ensuring that persons with lived experience of vision loss and blindness are at the strategy table.
- Ensuring that disability awareness training and inclusion are incorporated into all aspects of the strategy.
- Adding provisions as to how the strategy will be monitored and measured for effectiveness
- Adding a funding framework which includes vision loss rehabilitation

Content

The Alliance for Equality of Blind Canadians (AEBC) recognizes Bill C-284, *The National Strategy for Eye Care Act*, as a commendable step toward addressing gaps in eye care services and preventing vision loss across Canada. By establishing a national strategy to improve access to preventative eye care, the bill could help reduce avoidable vision impairments and promote public awareness of eye health. However, AEBC believes the bill falls short in several critical areas. It does not sufficiently address the needs of individuals who are already blind or those who will acquire vision loss for which there is no available treatment. It also lacks a comprehensive framework for ensuring disability rights and inclusion. This briefing outlines the importance of strengthening the bill to ensure it meets the needs of all Canadians, including those who are already, or will become blind or experience vision loss, by incorporating robust legislative protections, advocacy for disability inclusion,

and provisions for vision rehabilitation. Vision rehabilitation must include: Low vision rehabilitation to enhance remaining vision; and Vision loss rehabilitation which teaches practical skills to enhance independence, safety and mobility after the loss of sight. Such a definition should be included in the bill to ensure the strategy does not overlook the latter.

While Bill C-284 aims to improve eye care services, it primarily focuses on the prevention of vision loss. For those who have already lost their sight or will do so despite advancement in treatments, it is critical that the bill expands its scope to include comprehensive supports such as vision loss rehabilitation services, social inclusion, and protection of rights. According to data from the Canadian National Institute for the Blind (CNIB), over 1.5 million Canadians live with vision loss, and this number is expected to rise with the aging population. Blind Canadians need more than medical treatment; they require access to rehabilitation services that empower them to live independently, participate fully in society, and have equal access to employment and education opportunities.

The *Canadian Council of the Blind (CCB)* has also expressed support for Bill C-284, but agrees that more needs to be done to address the wider spectrum of vision-related challenges. AEBC along with the CCB, urges policymakers to consider the broader social determinants of health that impact people with vision loss, such as access to employment, education, and social services.

Without addressing these systemic barriers, the national eye care strategy risks failing to meet the holistic needs of Canadians with vision impairments.

It is critical to understand that medical interventions alone are not enough to support those with vision loss. Vision loss rehabilitation is an essential service that enables people with vision impairments to adapt to their circumstances and regain independence. Programs such as orientation and mobility training, assistive technology instruction, and life skills education are vital for individuals to navigate their environments and live fulfilling lives.

Bill C-284 should explicitly mandate the inclusion of vision loss rehabilitation services as part of the national strategy, ensuring that those who experience irreversible vision loss receive the support they need to thrive.

Furthermore, disability rights must be central to the development of any national strategy for eye care. It is well known that people with vision loss often face discrimination in employment, education, and public life due to outdated perceptions and insufficient legal protections.

In Canada, legislation such as the Accessible Canada Act (ACA) has made strides toward creating inclusive environments for people with disabilities. However, AEBC believes that Bill C-284 should incorporate a stronger focus on the enforcement of disability rights and ensure that all Canadians with vision loss are protected under comprehensive anti-discrimination laws and policies.

In addition to legislating for better medical care, the bill must also advocate for disability inclusion training across all sectors. Mandatory training on disability awareness, particularly for employers and service providers, is critical to breaking down barriers and improving accessibility for people with disabilities. Blind Canadians, in particular, face unique challenges in the workplace due to misconceptions about their abilities and a lack of accessible tools.

AEBC recommends that Bill C-284 include provisions for mandatory disability awareness training as part of a national eye care strategy. This would ensure that individuals with vision loss are not only supported medically but are also given equal opportunities to contribute to society without facing prejudice.

The Canadian government must also work closely with disability organizations, such as AEBC, to ensure that the voices of people with lived experience of vision loss and blindness are heard during the development and implementation of the national eye care strategy. Disabled Persons Organizations (DPOs) have invaluable insights into the barriers faced by their members and can provide critical guidance on how to create inclusive policies.

One of the most significant gaps in Bill C-284 is its lack of detail on how the national strategy will be implemented, monitored, and measured for effectiveness. AEBC recommends that the bill include clear metrics and accountability mechanisms to ensure that progress is made toward improving access to eye care services, vision rehabilitation, and disability inclusion. This could include regular reporting to Parliament, consultations with stakeholders, and the establishment of an oversight committee to track the strategy's outcomes. It is also essential that the strategy be responsive to the changing

needs of Canadians, particularly as the population ages and the prevalence of vision loss increases.

In addition, AEBC advocates for the inclusion of a funding framework within Bill C-284 to support vision rehabilitation services and ensure that Canadians living with vision loss have access to the resources they need. Without dedicated funding, the national strategy risks being under-resourced and unable to deliver meaningful improvements to eye care and vision rehabilitation across the country.

Conclusion

Bill C-284 presents an important opportunity to create a national framework for improving eye care services and preventing vision loss in Canada. However, AEBC believes that the bill must be strengthened to ensure that it meets the needs of all Canadians, including those who are already blind or experiencing vision loss. By expanding the bill's focus to include vision loss rehabilitation, disability rights, and comprehensive disability inclusion training, policymakers can create a more equitable and effective national strategy for eye care. AEBC is ready to work with legislators and other stakeholders to ensure that Bill C-284 fulfills its potential to improve the lives of all Canadians with vision loss.

We urge legislators to consider these recommendations and work toward a strategy that addresses the full spectrum of vision-related challenges, from prevention and treatment to rehabilitation and inclusion. With these amendments, Bill C-284 can become a transformative piece of legislation that promotes eye health and ensures the full participation of Canadians with vision loss in all aspects of society.