Consultation on the Green Paper on Ageing

Fields marked with * are mandatory.

Introduction

GREEN PAPER ON AGEING – Fostering solidarity and responsibility between generations

This Commission has put demography high on the EU policy agenda. In June 2020, it presented the report on the impact of demographic change setting out the key facts of demographic change and its likely impacts. The green paper on ageing is the first outcome to this report and launches a debate on one of the defining demographic transformations in Europe - namely ageing.

Never before have so many Europeans enjoyed such long lives. This is a major achievement that is underpinned by the EU's social market economy. One of the most prominent features of ageing is that the share and the number of older people in the EU will increase. Today, 20% of the population is above 65. By 2070, it will be 30%. The share of people above 80 is expected to more than double, reaching 13% by 2070.

This demographic trend is having a significant impact on people’s everyday lives and on our societies. It has implications for economic growth, fiscal sustainability, health and long-term care, social cohesion and intergenerational fairness, and it concerns every age. In addition, the pandemic’s disproportionate impact on older people – in terms of hospitalisations and deaths - has highlighted some of the challenges an ageing population poses to health and social care systems. However, ageing also provides new opportunities for creating new jobs, boosting prosperity, for instance in the ‘silver’ and care economies, and fostering intergenerational cohesion.

This consultation enables all European citizens, Member States and relevant stakeholders to provide their views on the green paper on ageing and contribute to the debate.

About you

Language of my contribution *

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

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Organisation name

255 character(s) maximum

Finance Watch

Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

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Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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Country of origin

Please add your country of origin, or that of your organisation.

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- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon
- Albania
- Dominican Republic
- Lithuania
- Saint Vincent and the Grenadines
The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, ‘business association’, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected.

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Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

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I agree with the personal data protection provisions

The following questionnaire includes all the questions contained in the green paper on ageing.

You may provide your opinion in the text boxes under each question. Please feel free to either answer all the questions, or choose to answer the questions that are of most interest or concern you directly.

You can also upload your written contribution, if you so wish, by using the button available at the end of the questionnaire.

Laying the foundations (chapter 2 of the green paper)

1. How can healthy and active ageing policies be promoted from an early age and throughout the life span for everyone? How can children and young people be better equipped for the prospect of a longer life expectancy? What kind of support can the EU provide to the Member States?

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To better equip Europeans for longer lives, the EU can direct the creation of safe, affordable, means-tested, well-advertised financial products (cash, a payment account, insurance, consumer credit, savings, supplemental pension products). Financial products are in many cases very complex and therefore purchasing the right and most suitable financial product is a challenge for all age groups, in particular for those belonging to vulnerable groups. While a certain level of financial and digital education is necessary, it would be most effective for the EU to focus on developing safe, suitable products for all individuals instead of solely investing in adult financial and digital literacy programs which capture only a swath of the whole population and where the EU has only a limited mandate. Development of products and services targeting individuals on a low-income, lacking digital skills or living in remote areas is especially crucial.

2. What are the most significant obstacles to life-long learning across the life-cycle? At what stage in life could addressing those obstacles make most difference? How should this be tackled specifically in rural and remote areas?

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Unpaid care duties provided for dependent family members, borne predominantly by women across the EU, limit the capacity for such individuals to invest time and money into education and training programs. In turn, their own pension adequacy is negatively affected by the missed opportunity for career advancement unless adequate care credits or state financial support are provided as an acknowledgement of societal service provided by their labor. Individuals providing unpaid care often simultaneously work part-time jobs or gigs which offer little to no benefits and increase the potential for burnout and corresponding mental and physical health risks. Providing care services or compensation for familial care providers is crucial during the pre school years of children, throughout the life-cycle of disabled or impaired persons and when long-term care of elderly parents is necessary.

Viewing the development of quality, affordable care services or compensational systems for provision of care services as infrastructure - as a necessity to the functioning of society - is key to addressing this roadblock to life-long education and development.

In rural and remote areas where establishing care facilities are less economically viable, the development of training programs for caregivers or financial compensation for trained home health aides or personal care assistants can address the infrastructural need for dependent care.

Making the most of our working lives (chapter 3 of the green paper)

3. What innovative policy measures to improve participation in the labour market, in particular by older workers, should be considered more closely?

Partial retirement schemes, such as those currently functioning in Sweden and Finland, can be promoted as a means of extending the working lives of individuals and creating a more attractive work-life balance. Such schemes typically detract from future pension earnings however, and setting minimum pension accrual levels in order to prevent future scarcity for an individual typically prevents earners with disrupted careers (generally women) from participating in such programs. Adequate care credits can compensate for this effect.

Workplace adaptations on the basis of age generally lack policy support at Member State level and occur on a voluntary basis. This is despite evidence that such improvements benefit all workers; adaptations for changes in hearing or vision improve communication standards and measures to prevent musculoskeletal disorders reduce the demanding physical nature of manual work. Stronger pressure on Member States to adapt work sites to their ageing workforce and to fully utilise existing health and safety legislation should be considered.

4. Is there a need for more policies and action at EU level that support senior
entrepreneurship? What type of support is needed at EU level and how can we build on the successful social innovation examples of mentorship between young and older entrepreneurs?

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As with all initiatives and programs regarding ageing, they should be formed in close collaboration with senior advocacy groups.

The EU can support senior entrepreneurship by recommending entrepreneurial seniors be allowed to collect full or partial pension benefits. Allotting funds to support businesses through which skills are shared and transferred to younger generations could also be a way to incentivise active ageing and intergenerational cohesion.

5. How can EU policies help less developed regions and rural areas to manage ageing and depopulation? How can EU territories affected by the twin depopulation and ageing challenges make better use of the silver economy?

2500 character(s) maximum

New opportunities and challenges in retirement (chapter 4 of the green paper)

6. How could volunteering by older people and intergenerational learning be better supported, including across borders, to foster knowledge sharing and civic engagement? What role could a digital platform or other initiatives at EU level play and to whom should such initiatives be addressed? How could volunteering by young people together with and towards older people be combined into cross generational initiatives?

2500 character(s) maximum

7. Which services and enabling environment would need to be put in place or improved in order to ensure the autonomy, independence and rights of older people and enable their participation in society?

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Support accessibility

The legal and economic environment must be adapted to aid in the proliferation of assistive technologies, mainstream the concept of disability, keep the ageing population at work, improve pension adequacy and provide support outside of employment. Namely, the classification of assistive technologies should be expanded beyond the “medical” and “non-medical” binary coding of the Medical Device Directive to include “disability or impairment inclusive.” This would expand insurance coverage and reduce the financial burden placed upon households in need of such assistance. It must be recognised that a one-size-fits all approach for technologies for lifelong disabilities and age-related impairments is inappropriate.

Easily accessible, low-cost or free, reliable transport for seniors, especially in rural or remote areas, can be one way to ensure societal participation and autonomy. This could include government funded assistance for purchasing of bicycles or personal vehicles. Complementary efforts include safe cycling conditions, public awareness campaigns on safe cycling, promotion of lights and helmets, etc.

For financial services, initiatives include supporting building accessibility, the proliferation of adaptive technologies for public services and access to adaptive technologies for home use.

Adapt financial tools and services to the ageing population

Older people are less likely to possess digital skills, own digital devices or have internet access. Expanding age appropriate digital literacy courses, limiting costs of digital devices as well as traditional services and maintaining traditional methods of access respects the preferences and life circumstances of older people and improves access for other vulnerable groups. In the words of Cynthia Olmedo, “diversity is being invited to the dance. Inclusion is being asked to dance. Equity is allowing you to choose the music.”

Service providers should offer simplified webpage, application options or assistive technologies to older people or those living with impairment to improve autonomy and personal finance management. Improving accessibility to digital solutions can ease the mistrust, discomfort and confusion older people are more likely to experience and extend the benefits of convenience and choice that digitalisation readily offers to younger, able members of society.

8. How can the EU support vulnerable older persons who are not in a position to protect their own financial and personal interests, in particular in cross-border situations?

9. How can the EU support Member States’ efforts to ensure more fairness in the social protection systems across generations, gender, age and income groups, ensuring that they remain fiscally sound?
Collaboration with worker’s unions as well as women’s and seniors advocacy groups in the formation of all policies affecting pension and welfare systems is vital.

10. How can the risks of poverty in old age be reduced and addressed?

Strengthening the rights of older people and ensuring access to safe, affordable financial tools and services can reduce the risks of poverty in old age.

To strengthen rights the 2008 Council proposed Horizontal Directive should be revisited and the Convention on the Rights of Persons with Disabilities (CRPD) fully implemented. This would enable inclusion within and beyond the labour market and extend anti-discrimination protection to goods and services necessary for social and financial inclusion.

The EU must develop financial product guidelines enabling societal inclusion and financial wellbeing. The financial tools and services which are necessary for individuals to live a normal life, suitable to European standards are: cash, a payments account, savings account, a safe third pillar pension product, motor insurance, health insurance, home insurance and personal liability insurance.

Cash, which older people are more likely to use, must be affirmed as a means of payment and its framework maintained. Minimum geo-quotas on ATM availability, cash-back retail and post office banking options, elimination of fees for non-digital transactions, such as the printing of bank statements can ease physical and financial barriers. Increased efforts to promote the basic payment account could compliment this effort. The option is especially important for older immigrants and refugees who are most vulnerable to exclusion and low-income.

The benefits, risks and best practices for savings accounts should be promoted to working age populations to bolster financial well-being in old age. Products must be developed for low-income individuals.

Amendment of the Insurance Distribution Directive to improve demands and needs tests, increase consumer protection and create an obligation for providers to offer basic product options before attempting to upsell consumers is needed.

Financial advice is most effective when targeted at life cycle events; when planning tertiary education, beginning work life, purchasing a home, at the birth of the first child or loss of a dependent family member. Developing a minimum standard for the quality of debt and financial advice could ameliorate the disparity of service outcomes between Member States.

11. How can we ensure adequate pensions for those (mainly women) who spend large periods of their working life in unremunerated work (often care provision)?

See responses to questions 2 and 3.
12. What role could supplementary pensions play in ensuring adequate retirement incomes? How could they be extended throughout the EU and what would be the EU’s role in this process?

Supplementary pension products, such as that envisioned in the recent pan-European personal pension product (PEPP) legislation should include requirements to cap costs, offer basic options by default and only offer additional options after an adequate assessment of a consumer’s suitability and needs. The PEPP is a step forward, but may still not be safe, suitable and available to all, especially those on a very low income. In our survey a low awareness of the need to supplement public pensions, a lack of funds to contribute to supplemental products or the lack of attractive products limited access and use. This was especially relevant among respondents from Eastern European Member States.

Creating products targeting low income individuals and raising awareness of the need to supplement public pensions early on in the life of young adults is necessary toward increasing pension adequacy.

Meeting the growing needs of an ageing population (chapter 5 of the green paper)

13. How can the EU support Member States’ efforts to reconcile adequate and affordable healthcare and long-term care coverage with fiscal and financial sustainability?

14. How could the EU support Member States in addressing common long-term care challenges? What objectives and measures should be pursued through an EU policy framework addressing challenges such as accessibility, quality, affordability or working conditions? What are the considerations to be made for areas with low population density?
While private health insurance may not be necessary in Member States where the public health insurance is easily accessible and provides adequate coverage, there is a growing need in many countries to use private health insurance to expand coverage. This is especially relevant in meeting long term care needs, but also in regard to needs for preventative care, such as dentistry, and needs for autonomy, such as hearing aids or eyewear.

Affordability and age limits act as a barrier to private health insurance for many older individuals, with coverage linked to employment status, level of education and socioeconomic status. While not all private insurers in the EU have official age limits, new applicants between 60 and 75 are generally not accepted. Customers can also become trapped in a policy with rising fees without the possibility to change products based on such age limits.

Again, the amending the Insurance Distribution Directive (see response to q. 7) and finalising the Horizontal Directive to bolster the rights of older persons against market forces is necessary toward improving accessibility, affordability and quality of the level of care received in old age.

15. How can older people reap the benefits of the digitalisation of mobility and health services? How can the accessibility, availability, affordability and safety of public transport options for older persons, notably in rural and remote areas, be improved?

16. Are we sufficiently aware of the causes of and impacts of loneliness in our policy making? Which steps could be taken to help prevent loneliness and social isolation among older people? Which support can the EU give?
In our survey, digitalisation, and more specifically the loss of face-to-face interactions with financial service providers, was identified as contributing to increased feelings of social isolation among older people which we may not be readily aware of. The simple act of conversing with a bank teller or being able to reach their insurance agent by phone is sometimes the only social interaction older people have in their day. Digitalisation, while possessing the potential to increase access to financial tools, services and social interaction, must be navigated with its impact on and the needs of vulnerable individuals in mind.

As mentioned in the response to question ten, fully implementing the Convention on the Rights of Disabled Persons and expanding the classification of assistive technologies can expand access to digital platforms for social interaction and market participation. While some older people may be eager to expand their digital skills through age appropriate digital literacy courses and programs - which should be expanded and easily accessible - others may be more comfortable and capable using non-digital methods. Policy supporting the maintenance of traditional structures for accessing goods and services via social interaction may be a small, yet meaningful way to combat loneliness in old age. It is increasingly evident that inclusion means meeting the preferences and circumstances of individuals with matching opportunities for engagement.

17. Which role can multigenerational living and housing play in urban and rural planning in addressing the challenges of an ageing population? How could it be better harnessed?

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