



# **WRITTEN SUBMISSION FOR THE HOUSE OF COMMONS STANDING COMMITTEE ON FINANCE PRE-BUDGET CONSULTATION 2025 Pre-Budget Submission**



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**Submitted by:  
Canadian Ophthalmological Society**

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## List of Recommendations:

The Canadian Ophthalmological Society recommends the government take the following immediate steps:

**Recommendation 1:** That the federal government allocate the necessary funding and resources to accelerate the implementation of Bill C-284 *An Act to Establish a National Strategy for Eye Care*, ensuring that Canadians benefit from a fully integrated, evidence-based, and accessible national eye care strategy.

**Recommendation 2:** That the federal government invest \$10 million over five years in the 2025 Federal Budget to establish and fund the National Vision Health Desk (NVHD) and appoint a Chief Vision Health Officer to lead Canada's national eye care strategy.

**Recommendation 3:** Ensure Federal Leadership in Advancing Innovation and Artificial Intelligence (AI) in Vision Health Research and Care Delivery

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## Background:

The Canadian Ophthalmological Society (COS) is the national, recognized authority on eye and vision care in Canada. As eye physicians and surgeons, we are committed to ensuring all Canadians have access to the highest standard of medical and surgical eye care.

Our membership includes over 900 ophthalmologists and 200 ophthalmology residents. We work collaboratively with government, other national and international specialty societies, our academic communities ([ACUPO](#)), our provincial partners and affiliates, and other eye care professionals and patient groups to advocate for health policy in Canada in the area of eye and vision health.

COS is an accredited, award-winning provider of Continuing Professional Development (CPD) through the Royal College of Physicians and Surgeons of Canada (RCPSC) and is an affiliate of the Canadian Medical Association (CMA).

The mission of the Canadian Ophthalmological Society (COS) is to strive toward the provision of optimal medical and surgical eye care for all Canadians by promoting excellence in ophthalmology and providing services to support its members in practice.

COS advances vision health by improving Canadian eye care standards through the work of its Board of Directors, Councils and Committees, as well as ties with national and international ophthalmological and eye care organizations.

The COS and its member eye physicians and surgeons are the foremost subject matter experts in eye care across the country and leading advocates for vision health for all Canadians.




## **Recommendation 1: A National Strategy for Eye Care**

In June of 2022, Bill C-284 received unanimous support in the House of Commons, later passing the Senate, and receiving Royal Assent in November 2024. This landmark legislation mandates a coordinated approach to preventing and treating eye diseases, improving access to rehabilitation services, and ultimately enhancing health outcomes for all Canadians.

The Canadian Ophthalmological Society (COS) urges the federal government to prioritize the swift implementation of Bill C-284 and commit the necessary resources to ensure its success. A nationally coordinated strategy will improve equitable access to eye care, support early detection and prevention efforts, enhance treatment and rehabilitation services, and advance critical research aimed at preventing vision loss. To truly improve equitable access to eye care, the strategy must prioritize a balanced distribution of health determinants, outcomes, and resources across all segments of the population, particularly those facing social, economic, and geographic barriers.

Collaboration is at the heart of this strategy. The COS, along with the Vision Health Partners Coalition that includes the Canadian Association of Optometrists (CAO), Fighting Blindness Canada (FBC), the Canadian National Institute for the Blind (CNIB), Vision Loss Rehabilitation Canada, Diabetes Canada, and the Canadian Council of the Blind (CCB), is dedicated to building an integrated system that improves patient access to timely and appropriate care. Through defined referral pathways, workforce planning, shared education, and public awareness initiatives, we can ensure a more efficient use of health care resources and a clearer understanding among Canadians about where to seek eye care for their specific needs.

The continued support and implementation of Bill C-284 presents an historic opportunity to transform eye care in Canada, becoming international leaders in access to essential eye care services in alignment with the United Nations mandate for 2030 Vision for All. By centralizing research efforts, fostering



professional collaboration, and leveraging technology-driven solutions, this legislation will lay the foundation for sustainable, equitable, and high-impact outcomes in eye health for Canadians, serving as a model for other countries.

As Canada moves forward with its national eye care strategy, COS stands ready to work alongside the federal government and our partners to drive meaningful progress. With the right investments, we can ensure that all Canadians have timely access to high-quality vision care, reducing the burden of preventable vision loss and enhancing quality of life across the country.

## **Recommendation 2: The Creation and Funding of the National Vision Health Desk (NVHD)**

With the passing of Bill C-284 in November 2024, Canada's national eye care strategy has underscored the urgent need for greater support in vision health. Good vision is fundamental to overall well-being, and over 80% of Canadians fear vision loss more than any other disability<sup>1</sup>. Today, 1.2 million Canadians are living with vision loss, while more than 8 million are affected by major eye diseases<sup>2</sup>.


The economic burden of vision loss is equally significant. In 2019, the total cost of vision loss in Canada was \$32.9 billion<sup>3</sup>. However, research has demonstrated that timely diagnosis and treatment of eye disease not only improves health outcomes but also results in long-term cost savings for the health care system.

To address this growing challenge, the Canadian Ophthalmological Society (COS) strongly recommends that the federal government allocate \$10 million over five years in Federal Budget 2025 to establish and fund the National Vision Health Desk (NVHD) at the Public Health Agency of Canada. Additionally, we urge the government to appoint a Chief Vision Health Officer to oversee its operations and drive strategic action in eye health.



## The National Vision Health Desk (NVHD) would:

- ***Develop the National Strategy*** as outlined in Bill C-284 for Action on Eye Health and Vision Care, to ensure a coordinated, evidence-based approach to improving vision health across Canada.
- ***Support the work of the federal government*** in the creation of an essential ophthalmic drug list within the National Pharmacare framework to improve accessibility and affordability of critical treatments.
- ***Create a standardized national policy*** for vision screening across the country, with a particular focus on children, seniors, and Indigenous peoples.
- ***Develop patient care pathways*** for the most common eye diseases with expert guidance led by ophthalmology, delineating inter-professional collaboration amongst physicians, opticians, optometrists, and ophthalmologists to streamline care, avoid duplication, and ensure the best patient safety and outcomes.
- ***Be focused*** on coordinated action by governments, health professionals, non-government organizations, industry, and individuals working in partnership to optimize development and implementation.
- ***Oversee research*** with the goal to identify gaps in the evidence for vision care, and to guide future research activities. There is no dedicated funding for eye health within the Canadian Institutes for Health Research (CIHR)<sup>4</sup>. There is no overarching body like the US National Eye Institute to set priorities or coordinate vision research and translate science into health services.
- ***Educate the public*** by implementing public awareness campaigns about the importance of eye health as a core component of overall health care, including, but not limited to:
  - Many Canadians are still not as aware of the signs and risk factors for vision loss.

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- 75% of visual impairment is preventable with early detection and treatment<sup>5</sup>.
  - Public awareness of the abilities of people with vision loss is essential to enhancing opportunities for Canadians with sight loss.
  - ***Become the central compendium/library*** for eye health research across Canada.

## **A Strategic Investment in Canada's Vision Health**

Funding the National Vision Health Desk is a crucial step in ensuring excellence in eye care across Canada. By working in close collaboration with the government, health care professionals, and patient advocacy organizations, we can raise awareness, mobilize resources, and strengthen vision health initiatives.

A dedicated National Vision Health Desk, led by a Chief Vision Health Officer, will provide the leadership and coordination needed to efficiently drive evidence-based policies, enhance access to care, and reduce preventable blindness.

Our goal is clear: to prevent blindness, improve access to care, and preserve high-quality vision for all Canadians. The Canadian Ophthalmological Society urges the government to seize this opportunity to make vision care a national priority.



### **Recommendation 3: Ensure Federal Leadership in Advancing Innovation and Artificial Intelligence (AI) in Vision Health Research and Care Delivery**


The Canadian Ophthalmological Society (COS) urges the federal government to support innovation, digital health tools, and artificial intelligence (AI) in vision health by ensuring that eye care remains a core priority within any federal initiatives on health care innovation and AI policy development.

Ophthalmology is uniquely positioned to benefit from AI integration due to its focus on imaging and data-driven diagnostics. In a recent Canadian validation study, the CARA AI platform—developed in partnership with the Centre hospitalier de l'Université de Montréal (CHUM)—achieved 93% sensitivity and 71% specificity in detecting referable diabetic retinopathy<sup>6</sup>. Further research and innovative models, including those being developed by Euclid Telehealth and Orbis Canada's AI-enabled vision screening initiatives, are also demonstrating meaningful success. Such tools can help deliver faster, earlier diagnoses to patients especially in rural, remote, and underserved communities, including Indigenous populations, while enabling more efficient use of clinical resources. Importantly, AI applications in vision health can complement the work of ophthalmologists by expanding access and improving referral pathways.

With an aging population and rising prevalence of vision-threatening diseases such as diabetic retinopathy, glaucoma, and macular degeneration, federal coordination is urgently needed to ensure that Canadians can benefit from these advances. Smart investment in AI tools for vision health supports the government's broader agenda to increase productivity, unlock the potential of new technologies, and deliver results-focused public services.

To fully realize these benefits, and to ensure Canada is at the forefront of advancements in vision health, COS recommends that the federal government:



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- ***Integrate vision health into national AI and digital health strategies***, ensuring that ophthalmology is recognized as a high-impact area for health system innovation and modernization.
  - ***Support the deployment of proven and Health Canada-approved AI-powered diagnostic and clinical decision-support tools*** in eye care, with targeted investment in models that improve access for rural, remote, and Indigenous communities.
  - ***Promote intersectoral collaboration*** among government, academia, health providers, and the Canadian technology sector to drive scalable innovation in vision care.
  - ***Prioritize investment in health data infrastructure and virtual screening capacity*** to support early diagnosis, population health management, and precision medicine approaches in ophthalmology.
  - ***Establish dedicated federal support for vision health research***, including targeted funding within the Canadian Institutes of Health Research (CIHR) to support public-private partnerships and applied research.

By embedding vision health into Canada's broader innovation and productivity agenda, the federal government can help unlock a more equitable, accessible, and resilient health care system. The COS and its partners are committed to working collaboratively with government to ensure that AI delivers tangible health benefits, particularly for those who have historically faced barriers to care. In doing so, Canada can lead by example in aligning digital transformation with inclusive growth and national well-being.

## REFERENCES

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- <sup>1</sup> **Canadian National Institute for the Blind & Environics Research.** (2019). *Public attitudes about vision health*. Retrieved from <https://www.cnib.ca>
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- <sup>5</sup> **World Health Organization.** (2019). *World report on vision*. Retrieved from <https://www.who.int/publications/i/item/world-report-on-vision>
- <sup>6</sup> **Bélanger, S., et al.** (2024). *Artificial Intelligence Diabetic Retinopathy Screening in Primary Care in Québec Using the CARA System: Prospective Validation Study*. *JMIR Diabetes*, 9(1), e59867. <https://diabetes.jmir.org/2024/1/e59867>