

Response to the European Commission's Green Paper on Ageing by the National Council for the Elderly (Malta) - Kunsill Nazzjonali tal-Anzjani (KNA).

The Kunsill Nazzjonali tal-Anzjani (KNA) is the national umbrella organisation within which the major national older citizens social, political, church and pensioners' organisations are affiliated. KNA has taken note of the European Commission's Green Paper on Ageing and having disseminated the text and discussed it, gladly accepts the invitation to contribute to the debate with our views.

Preliminary remarks

A.1 In its introduction, the Commission gives an overview of the global challenges of ageing, but focusses particularly on significant variance in life expectancy of the urban as compared to rural areas in the Member States. Rather than limiting oneself to one dimension of urban versus rural communities, a broader view needs to be adopted that would allow the examination of various inequalities among the older sector of the European society. Inequalities that may impinge on life expectancy, such as the growing gap between the affluent and poor, the situation of older persons in the old democracies as compared to those living in the relatively new free economies are to be more closely examined. Work conditions, access to health care and health prevention, housing and environmental issues may be underlying factors related to life expectancy.

A.2 Apart from an ageing European population and the ever-growing gap between rich and poor in the European Union, there are however, other equally daunting challenges such as climate change and the challenge to keep the world liveable, globalisation and global interdependence.

A.3 COVID19 not only put pressure on the caring and health systems, but is having significant socio-economic repercussions in the European States and in the world. The pandemic has boosted some economic sectors, while others are under severe pressure. Rebuilding the economy therefore requires fresh rethinking of the financial, economic and monetary policies in order to meet the challenge.

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?*

1.1 Concepts related to healthy and active life and ancillary subjects are presumed to permeate the formal and informal educational experience of every person from birth throughout all stages of one's life span. Healthy and active ageing is the consequential result of a healthy and active childhood and adulthood. However, the presumption of an all-encompassing leitmotif in the learning process may in real fact present lacunae, leaving out essential areas of knowledge, skills, understanding and experience in specific areas such as intergenerational solidarity, financial literacy, physical and mental wellbeing, work-family balance and education for active democratic citizenship. The EU can offer support by bringing to the fore such cross-dimensional aspects in formal and non-formal education in a life-long learning process and by highlighting the best practices in life-long learning, that are conducive to healthy and active ageing in a longer life expectancy scenario.

1.2 Another policy conducive to preparing for a longer life expectancy is the professionalization of the caring workers. In order that the young generations are attracted to the caring professions, career prospects must be created which are comparable to other professions. The importation of care-workers for low paid jobs is only a short-time measure, since the second generation is more likely to aspire for jobs that carry more recognition and prestige. Most health and care professionals are women and their professions are financially and socially undervalued. Political initiatives to reassess these professions and make them better paid and more attractive for both women and men in every member state is a dire necessity. EU can help in the professionalization process as well as in promoting new technologies that facilitate care.

1.3 A longer life expectancy brought forward the emergence of a distinction between the third and the fourth age. This is because longer life expectancy also means longer healthy life expectancy and also longer dependency expectancy. This important distinction cannot be addressed with just one approach for old age; it requires an EU policy that caters for the diverse scenarios that longer life expectancy brings about. Investment in cultural and social life throughout life helps enhancing the quality of life at older age.

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?*

2.1 A most significant obstacle in life-long learning is the general lack of understanding of what life-long learning is all about. The very fact that the topic has been brought up in the Green Paper on Aging helps perpetrate the erroneous notion that life-long learning has to do with the later part of the lifecycle. Elder persons can only benefit from life-long learning provisions in proportion to how adequate personal and collective investment would have been made throughout their lives much in the same way as benefits of a material nature. Similarly, remedial action at this later stage can only mitigate the deficiencies as the most endowed are more likely to benefit most. Those who had perceived success in the learning process benefit most from mainstream life-long learning provision in later years. Therefore new and innovative ways must be sought that target those who most need.

2.2 Another obstacle is the still not widely implemented processes of valuation and validation of prior learning of formal, non-formal and informal learning. Coupled with this is a general notion that learning is an unpleasant duty rather than something one looks forward to and enjoys doing. A common slogan such as 'never too late to learn' defeats its own purpose as it emphasises the duty rather than the pleasure of learning.

2.3 Such obstacles impinge in all stages of life, most crucially in the early years with the first encounter with formal learning and literacy. A system of education which does not embrace diversity, different modes and styles of learning and methodologies to meet individual needs, is bound to fail in its life-long learning endeavour.

2.4 Regarding deficiencies in the rural and distance areas, initiatives need to be two pronged. A) stronger and more widespread digital networks that encompass the whole territory and B) strong investment in digital education. Deficiencies in any one of them, renders the other ineffective.

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?

3.1 We believe in a more balanced and differentiated approach on retirement-age. There is a need to explore alternative forms whereby flexible retirement schemes, flexible careers possibilities and end-of career schemes for older workers should be promoted and organised. One such idea is that of **duo-jobs**, where older workers share their tasks and missions with young people. Clerical employment for older people offers the opportunity in their final years of employment to pass on their experience to younger co-workers.

3.2 Policies on unpaid work (such as child-raising, care for the elderly, household responsibilities) should also be developed. A proposal for consideration is to take into account certain forms of unpaid work when calculating pensions and retirement ages.

3.3. The Green Paper makes reference to the so-called Silver Economy and investment in services or goods that benefit older people as a possible source of employment and economic activity. It is talking about tourism, but also care and investment and research into adapted goods and services that improve the quality of life and independence of older people. Based on research, investment and proper education and training programmes the opportunities that older persons offer as consumers should be harnessed in order to offer new jobs not least for the older workers themselves.

3.4 Digitalisation, the digital economy and services create a digital divide that cannot be addressed by investment in infrastructure or training alone. Policies regarding age-friendly digitalisation may mitigate the obstacles that hinder the participation of a section of the older population in the labour market and in social life.

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?

4.1 Ageing workforces and the increasing dependency ratios in developed economies make it necessary a new interest in policy and research towards older workers, including the promotion of business start-ups and self-employment. It is expected that as populations ages, the number of older business founders will increase. On the other hand, older employees are being 'pushed' from the traditional labour market by factors such as age discriminatory practices in recruitment, promotion and training as well as a lack of attractive employment options. Starting up in business may be the only alternative for mature individuals wishing to resume economic activity. KNA feels that incentives for start-ups should not exclude entrepreneurship on the basis of age.

4.2 Since many older individuals, especially those from professional backgrounds, benefit from substantial amounts of human and social capital accumulated over a long working career, it would stand to reason that they would have a lot to offer in the role of business coach, mentor and in the case of wealthier individuals, as 'business angels'. However, there is not enough research evidence on the extent or effectiveness of such activities. Pan-European research on this area is highly recommended.

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?

5.1 The EU faces a number of demographic challenges amongst which the depopulation of some of its regions. Regional strategies need to be enhanced in order to increase a region's attractiveness

through, for instance, economic initiatives and digital connectivity. In a rural desertification context a number of initiatives need to be strengthened, aiming to address lack of job opportunities, and entrepreneurship incentives and lack of adequate healthcare provision.

5.2 The Green Paper while bringing into the discussion the demographic issues, does not however include the phenomenon of immigration of third country nationals into the discussion. Depopulation of certain European regions and especially in the rural areas can find its equilibrium with carefully planned repopulation by offering third country nationals opportunities in depopulated regions while at the time releasing the pressure on over populated regions that confine the borders of the European Union. Nevertheless, the arrival of migrants in the EU may only temporarily ease the problem of ageing in certain regions, as in the long term these migrants themselves will gradually age. However, if integration policies are in place and the right support for raising a family, immigration may have a more long-lasting impact.

5.3 Encouragement in the regions including the rural areas to support the Silver Economy sector, helps provide adapted goods and services while also creating jobs. Support to the sector should be addressed both in Rural Development Programmes of the Common Agriculture Policy and in Operational Programmes of the Cohesion Policy. An integrated strategy is needed to enhance the attractiveness of the area among older adults. Therefore it is important to develop calls for projects specifically on the Silver Economy in rural and mountainous areas under INTERREG programmes, to encourage interregional exchange, and under Horizon Europe to foster innovation and support applied research and multi-stakeholder approaches.

5.4 It is also crucial to promote Age-Friendly environments, through the good practices and exchanges developed to provide intra region collection transportation as well as bridge the gap of accessibility between urban and rural areas.

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?

6.1 It is noted that the Commission is appealing to senior citizens to take an active role in the caring for their grandchildren and children. From our point of view this seems to show little respect and lack of recognition for the commitment of senior citizens in society. It is among the older sector of society that solidarity is most embraced.

6.2 Older people are strongly motivated to participate in intergenerational learning for altruistic reasons: to pass on their skills and knowledge to the younger generation. The concept of “generativity” has been developed to help explain this attitude, which can be broadly defined as “the concern in establishing and guiding the next generation”. Typically, people develop generativity in their midlife (late adulthood). When they are settled in their careers they tend to identify a desire to participate in activities that give them a sense of purpose and progression in their lives. Older jobseekers, for example, have reported that they see work as an opportunity to teach, train and

share skills with younger generations. Opportunities for such transmission of knowledge and skills are to be supported.

6.3 What is expected is that the Commission makes concrete policy proposals that value this commitment from Senior Citizens and to make it more feasible and effective.

6.4 A policy measure is to take into account the unpaid care leave of all employees including older workers in the acquisition of pension rights is a necessary incentive.

6.5 A digital platform or other initiatives at EU level needs to be designed to be age friendly and should not be sectorized. One element that has militated against intergenerational learning is the isolation of sectors of society from others, with very little interaction between the generations.

6.6 Younger people equally appreciate the opportunity to share knowledge and to 'make a difference' to the lives of other people and contribute to their local community. Through more formal activity, often leading to an award or other form of recognition, young people can be keen to demonstrate new skills and build confidence, with a view to meeting the needs of prospective employers or make applications to colleges and universities. For educators, older volunteers are a useful extra resource, often focussed on helping children improve their literacy, numeracy and social skills in a friendly and supportive environment. They can bring additional skills and enthusiasm to assist a teacher in the delivery of their work and in recreational activities. In the workplace they can provide on the job training to reduce the need for formal training, particularly while mentoring apprentices and supervising their practical training they can pass on their know-how and expertise.

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?

7.1 The current COVID19 crisis has highlighted a number of gaps in the policy on the pharmaceutical sector at European level. We would like to call for more transparent and socially oriented policies on innovation, healthcare, medical devices and medicines.

7.2. Policies should be developed to invest in the social services sector (care professions, health workers) and to give more value to the jobs in this social profit sector. Special attention should be given to the development of a European labour market policy in the sector of care and healthcare services. Workers leave their own country to work in care or healthcare professions in other countries at better conditions, while there is a distressing lack of them in their own country, where pay and working conditions are undervalued.

7.3. Concerning housing for seniors, we would like to call for significant investment at European level in adapted housing for seniors to enable them to live independently for a longer period of time. Member States, regions and local authorities have many good practices in this area. The European Union could support such projects through the Structural Funds. This should not be limited to small-scale initiatives, but should also include investment in the creation of life-proof housing, i.e. housing that is adapted or can easily be adapted for people with reduced mobility.

7.4. The onslaught of the digital economy and services have created a digital divide that cannot be addressed simply by investment in infrastructure or training. Safeguards to ensure non-

discrimination caused by digitised economy are to be put in place. One such discriminatory element is the imposition of additional charges for non-digital services.

7.5 Age-friendly digitalisation that takes into account the specific situation of the elderly is to be a criterion when putting in place innovative digital services.

7.6 Regarding investment policy in infrastructures and services, it is necessary to consider to what extent they contribute to making our living environments and communities age-friendly and conducive to a participative communal life by all sectors of the community. The WHO programme on Age-Friendly Cities and Communities is an important tool.

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?

8.1 The European Union should endeavour to see that all member states ratify the 35: Hague Convention of 13 January 2000 on the International Protection of Adults.

8.2 When acting in this field, the European Institutions should refer to the same principles underlying the Hague Convention, such as, in particular, the principle whereby, as stated in the preamble of the Hague Convention, the interests of the adult and respect for their dignity and autonomy are to be primary considerations.

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?

9.1 The Green-paper correctly points out the need to find alternatives to the current financing of the social systems. We urge for greater pan-European safeguards with regard to insolvency and risk management involving pension funds.

9.2 The creation of EU standards for a 'minimum pension' and to ensure pension, life and health insurance portability is to be seriously considered

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

10.1 Poverty is on the rise, despite good policy intentions. In 2018, 1 out of 7 seniors above 65 years of age in the European Union was at risk of poverty and this is an upward trend. The social and economic consequences of the COVID19 health crisis tends to raise this gap between rich and poor. Pensions are no longer enough to guarantee the elderly a life in dignity. The fight against poverty is a fight addressing poverty at all stages of life from childhood to old age. Combating poverty presupposes structural measures to close ensure a decent living to every person. An adequate guaranteed minimum income above the poverty-level is the first structural step. In this context, we advocate a European 'minimum guaranteed income'.

10.4 Voluntary work and career or study leave should also be credited when calculating pensions.

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)?

11.1 Poverty is feminised: 16% of retired women and 12% of retired men in the European Union live on an income below the poverty line. On average, women's pension is 30% lower than that of

men. It is favourably noted that the Commission in its Communication renders attention to the gender pension gap. Since pensions are calculated on the basis of professional income and career, the gender pay gap plays an important role. Equal pay policies should help levelling out the gender gap in the long future.

11.2 This is compounded by the fact that more women than men have incomplete professional careers because of pregnancy, responsibility for childcare and education, and caring for sick or dependent family members or their parents. Better sharing of labour and care tasks between women and men through improved care leave and career breaks are therefore very important elements for eliminating the pension gap.

11.3 Systems whereby gaps in the pension contributions can be remedied with post-dated settlements in order to qualify for a full pension.

11.4 Assistance in caring for dependents can enable workers, mostly women, to participate in the labour market ensuring an adequate pension while contributing to the welfare system.

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?

12.1 Supplementary retirement savings will in many countries become necessary to secure adequate replacement rates in the future if the current trends persist. Supplementary pensions can take the form of occupational pensions, that is pension schemes organised at the level of company or sector and accessed through an employment relationship, or personal pensions through individual contracts with a pension insurance provider. Their importance varies significantly across Member States. In a few countries public pensions only provide basic anti-poverty protection and income replacement in old age largely depends on occupational pensions, in a few others they supplement the retirement income significantly while in most Member States the role of occupational pensions is still marginal. Personal pensions have relatively wide take-up only in some countries while in most countries it is moderate and fragmented and in many countries so low that it matters little to nothing for the average income replacement.

12.2 Tax incentives to employers as well as the retention of experienced and qualified personnel do not seem to have produced the desired effect in increasing occupational pensions. Consequently, more innovative incentives need to be explored in order to promote occupational incentives. Tax incentives for personal pension schemes likewise did not seem to have provided enough impetus.

12.3 Supplementary pensions are likely to play an ever greater role in maintaining the future adequacy of pensions, in particular where the adequacy of public pensions is expected to deteriorate. Public policies can promote occupational pension coverage through collective bargaining, depending on the national context. Tax and other financial incentives such as subsidies or matching contributions, are an important part of the policy mix to develop occupational and personal pensions.

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?

13.1 EU Member States face strong and growing fiscal pressures on their health and long-term care systems, driven by already high levels of public expenditure and debt in most countries,

demographic pressures and technological advances. Public health policy action is therefore needed to safeguard fiscal sustainability and to sustain the contribution of health care and long term care systems in continuous improvement of public health. The provision of health and long-term care systems which is fiscally sustainable through the enhancement of efficiency and effectiveness must also ensure access of all to good quality services.

13.2 Country-specific fiscal sustainability assessment by the Commission of the health provision is required in order to provide an understanding of the scope to increase efficiency by capturing overall system organisation, of the strategy to achieve this outcome, as well as of the level of urgency, based on current and projected spending trends. Comparative analyses of reforms, system challenges and efficiency enhancing policy options, provide an overview of possible measures to tackle criticalities.

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?

14.1 In most countries, LTC for the elderly is not a distinct social policy field and is characterised by a fragmentation of responsibilities and a lack of integration between health and social aspects of LTC provision. LTC is typically funded from different sources and organised at different horizontal and vertical levels. With a few exceptions, in member states the health system is responsible for the care provided by health professionals, while services related to supporting the care-dependent person in the activities of daily life are usually organised by the social sector.. In most countries, this horizontal split between the health and social sectors is accompanied by a vertical division of responsibilities, with powers attributed at different institutional levels: national, regional and local. The EU can provide assistance for a more integrated approach of LTC provision.

14.2 Insufficient availability of residential care affects all regions in Europe. Many member states are moving towards a policy mix of home care and community care. However, deinstitutionalisation may become a concern when it is not matched with a sufficient increase in more and affordable home care and community-care provision. Deinstitutionalisation is part of an overall reorganisation of LTC provisions and not a “cheap” option, Residential facilities should nevertheless be accessible and affordable.

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?

15.1 The convergence of the internet and personal and connected devices, has resulted in transport services progressively embracing digitalisation too. This has led to many benefits. Yet with a growing dependency on digital technologies comes an increased pressure for exclusive digitalization and an increased risk that technology be introduced as an end in itself rather than as a means to purposeful ends, with potentially adverse consequences on society. Digitization of public transportation can potentially render a double exclusion to older persons due to difficulties of access to the new technologies.

15.2 The potential and the ability to use physical means of transportation plays an important role in social inclusion. Mobility is also acknowledged as one of the dimensions through which social exclusion can arise or be reinforced. Some people may need to rely partly or mostly on non-privately owned transport modes, such as public transport and semi-public forms of transport services to fulfil their mobility needs. This underpins the importance of these services for social inclusion. Furthermore, shared mobility services have also been presented as having the potential to unfold social inclusivity effects.

15.3 Data regarding mobile phone and internet penetration rates do not indicate the more complex reality that benefitting from what the digital world has to offer is not only about possessing a device or an internet connection. The type of material, digital skills and personal factors are just a few aspects that play a crucial role in how people make use of the ever-evolving digital technologies. As information provided on the internet is virtually infinite and as technologies become increasingly utilised for decision-making, high-order information skills are required to search, find, process, select and critically assess information and the legitimacy of sources. In general, digital inequality tends to reflect and reinforce social inequality. Digital inequality exists and its social, economic and cultural consequences are acknowledged.

15.4 Lack of awareness on the part of services providers, particularly in the Health and transport areas, help exacerbate social exclusion and the inability to access essential service provision.

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?

16.1 Due to its subjective nature, loneliness is a complex experience which is difficult to conceptualize. Experiences of loneliness differ between individuals. Loneliness has been defined as an unpleasant feeling resulting from an individual's perceived or actual deficiency in the desired quality or quantity of their social relationships. For this reason it is not an easy task to address loneliness in policy making. Covid 19 has provided an opportunity for more awareness.

16.2 The inclusion of loneliness in the Green Paper implies that loneliness is related to old age. Empirical research however does not confirm the assumption. In fact, loneliness has not been found to increase in old age until one is aged 80 years and above. Overall, the relationship between age and loneliness forms a non-linear U-shape distribution, suggesting that loneliness is highest in adolescence and in those aged 80 or older but stays relatively stable throughout adulthood.

16.3 Many different interventions and approaches have been developed for reducing social isolation and loneliness. However, research over the past two decades has generally not yielded consistent findings, and it has provided limited evidence for the effectiveness of most of the approaches. This is due, in part, to the limited use of well controlled research designs and other limitations in research studies.

16.4 EU funded research and specific programmes aimed at addressing this complex issue are recommended

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?

17.1 The Green Paper states that there is a growing, but still nascent, tendency to arrange 'multi-generational housing', sometimes in the form of housing cooperatives, which can provide companionship for older residents, the transfer of skills and knowledge for younger residents, and valuable social interactions for all. This is an interesting model which emulates more closely knit societies and which should be preserved and supported.

17.2 Urban planning needs to adapt to the culture and way of life of the particular community. Apart from innovative building projects such as multigenerational living quarters, it is equally important to plan age-friendly open spaces, public buildings and streets that facilitate access and active participation in the community.

Dr Anthony DeGiovanni

International Secretary

National Council for the Elderly (KNA)

Malta