We welcome and thank you for the drafting and publication of this Green Paper. It usefully highlights many of the challenges and opportunities that face Europe as a collection of diverse ageing societies. The Paper's focus on areas beyond health and social care, and pension policy, is also helpful and more readily reflects the ways in which older people interact and engage with society. However, there are *a number of areas within the document that should be strengthened*, to underpin a coherent future policy on ageing and older people. This is needed to avoid unintended negative impacts of narrow approaches on diverse older populations, and to underpin equitable strategies to developing innovative and progressive ageing societies. Currently, the Green Paper vision is a little disjointed and *needs to go further in calling for the development of a range of mechanisms for the inclusion and integration of older people*, which supports and empowers their agency. In outlining these areas below, and within some of the responses to the survey items, **we would encourage the European Commission to advance an ambitious agenda (such as a White Paper and roadmap for future policy action) for the multifaceted participation of heterogeneous older populations that is underpinned by an integrative framework on ageing and equality across the life course.**

We highlight here four high-level areas for consideration by the European Commission in their work in this area. These reflect adjustments needed in the framing of ageing and older people within public policy, and central tenets of a more appropriate approach to the development of a future agenda for responding to and harnessing demographic ageing. Some references to recent supporting evidence are included at the end of this document, and we would point you to nos. 1, 4 and 5 in particular.

1. Balanced Presentation of challenges
While the Green Paper recognises some of the opportunities, its primary framing is rooted in the challenges for economic and system sustainability. It is correct to consider these challenges, but *challenges should be balanced with an explicit acknowledgement of the positives that arise from ageing societies*. This is even before we think about potential areas of innovation and development within technology and 'silver economy' markets. Benefits include: in terms of *family households*, where longer and more in-depth relationships with older adult relatives can lead to benefits in relationship quality, emotional and instrumental support and cross generation well-being; in terms of *neighbourhoods and communities*, where older people can drive the intergenerational transmission of positive values, and local and cultural knowledge, and champion local social actions; in terms of *economic and social development*, where older people can be important purveyors of experience and expertise, from everyday work processes and know-how, to advanced and specialist knowledge sets. *Without this balance in our framing, there is a strong tendency to problematize all aspects of ageing societies, and to remain deficit orientated in our responses.* This will have damaging consequences for how we approach policy development for and with older people.

2. Emphasise diversity and heterogeneity
Foregrounding this and other documents with *a strong recognition of the heterogeneity of the older population is needed to better understand the challenges that demographic*

ageing hold, and the 'solution space' that is available in adapting to these challenges. The diversity of age cohorts, life experiences (with different sets of accumulated disadvantages/advantages), gender, ethnic groups, sexual orientation, occupation, and health and economic abilities and capacities within current and future older populations give rise to a massive range of needs, preferences and expectations. Therefore, our *policy responses must not just focus on the absolute number of older people*, but the diversity of their differential set of needs and sets of agency. Helping member states to comprehend this, and plan accordingly, is *critical in deriving future policy approaches that are relevant and impactful for all groups of older adults*. It encourages a more developed frame for identifying types, modes and timing of policy and practice interventions and the intended and unintended consequences of each. *In line with the UN Sustainable Development 2030 agenda, a core goal of European policy and actions on demographic ageing should be to leave no one behind, and as such embracing this heterogeneity is fundamental.* It is also fundamental that our focus on constructs like healthy and active ageing is conditioned on working with diverse and marginalised groups of older people (e.g. older precarious workers; older migrants and ethnic groups; older homeless adults) to translate the meaning and application so that these concepts provided added value and positive impact. Currently, this is not the case universally.

3. Advancing equality in ageing societies

A fundamental aim of European actions and policy on demographic ageing should be to *secure equitable ageing societies, and advance an equality and rights agenda for older populations. This is something that is largely absent from the Green Paper*, and, in line with the UN Sustainable Development 2030 agenda, needs to be addressed in order to ensure no one is left behind. There remains a *significant task to promote ageing as a process of continued human development*. As a Union, nation states, communities and people, *we must universally elevate our expectations of what can be achieved in later life*. This involves embracing a comprehensive model of social participation that supports the agency of older adults to be full members of our European societies. There is evidence that older people across Europe experience *pervasive inequities in choice and control, resources and relationships, and power and rights in key domains of life*, including neighbourhood and community; services, amenities and mobility; material and financial resources; social relations; socio-cultural aspects of society; and civic participation. We also *need to actively challenge entrenched ageist discourses, which negatively locate older people within our societies,* as a part of any future policy actions in this area. As mentioned earlier, we *need to commit to the development of a range of mechanisms for the inclusion and integration of older people*, which empower their agency. Doing this across each domain would represent a practical approach – employment and volunteering should not be our only solutions. *If healthy and active ageing are to be central constructs in future policy, they, and interventions that support them, must be re-purposed as a means to deliver equity for all ageing populations.* With demographic ageing now evident across all marginalised and displaced groups, a more considered approach where support to the "scale and intensity that is proportionate to the level of disadvantage" (Marmot et al. 2010), is required to account for the accumulated risk and disadvantage accumulated across the life course.

4. Adopting a life-course, instead of a, life-cycle perspective

While the suggested life-cycle approach can be a helpful lens from which to examine demographic ageing, *a focus on the life-cycle can lead to a narrow stage-based, and a somewhat biomedical view of a human life path*. For this reason, its usefulness as an analytical tool and a policy framework can be limited and may result in more siloed and fragmented intervention design and implementation*. Future policy agendas on ageing and older people led by the European Commission should be underpinned by a life-course approach.* While this is not a major re-orientation, it is not simply the use of a different term, but critically it is about the sort of focus that it fosters. A life-course perspective *encourages a more fluid understanding of the development of people's lives and how social context (institutions, policies, norms) can create opportunity structures to shape that development.* There are two concepts within this perspective that may be especially relevant. The notion of *'linked lives'* helps illustrate how people's lives connect to each other, as do the interventions that are designed to support them. It shifts thinking from a pyramid structure of population age-groups (where different generations may be positioned in competition for scarce resources) to a mapping of relationships across societies. This can provide a useful way to think about policies that can impact multiple generations. The concept of *'life trajectories'* may be particularly valuable in helping to identify key turning points and transitions (e.g. retirement; bereavement; ill-health) where interventions have to be targeted, and in thinking through the implications of these interventions in older age. Identifying where risk is likely to be accumulated is central to this targeting and supporting and empowering the agency of individuals and groups in responding to particularly challenging events and transitions (e.g. ill-health; homelessness; unemployment; migration). It is also a helpful means of understanding how people's lives can incorporate multiple trajectories (e.g. social and relational; health; work and economic; civic; residential and spatial) that intersect. Policies that influence one of these trajectories can also indirectly influence others.

Finally, a cautionary note
In parts of the Green paper the focus seems a little too broad, and in other places a little too narrow and intervention driven. This dilutes the space and consideration that can be given to the specifics of ageing populations as a cross-cutting policy concern. In particular, while the sort of consideration of integrated policy development across different domains of policy (e.g. rural development), and across different generations (children and families), is welcomed, it runs the risk of distracting from the main purpose.

Supporting references

The majority of these publications reflect the output of two European Cost Actions, *Gender and health impacts of policies extending working life* (IS1409) and Reducing Old-Age Social Exclusion (CA15122) and/or stem from the work of the Irish Centre for Social Gerontology and its international collaborators, where these Actions were hosted.

1. Walsh, K., Scharf, T., Van Regenmortel, S., Wanka, A. (eds.) (2021). Social Exclusion in Later Life: Interdisciplinary and Policy Perspectives. International Perspectives on Aging, Volume 28. Springer. DOI: 10.1007/978-3-030-51406-. Open access at: https://link.springer.com/book/10.1007%2F978-3-030-51406-8

   With 77 contributors working across 28 nations, this book considers five different forms of exclusion, the interrelationships between these exclusions, and main policy challenges facing ageing societies.

2. ICSG (2021). The meaning of positive health and ageing for older adult Travellers and older people who have experienced homelessness. OTOH Briefing Report Series, Briefing Report no. 1. National University of Ireland Galway. Open access at: https://icsg.ie/wp-content/uploads/2021/02/nuig-policy-brief1-v9-1.pdf . Also see reports on life-course determinants of positive health and ageing, and home care, on the same webpage.

   This Briefing Report investigates what positive health and ageing constructs mean for two marginalised groups of older adults

3. Skinner, M., Winterton, R, and Walsh, K. (eds.) (2021). Rural Gerontology: Towards Critical Perspectives on Rural Ageing. Routledge: London (ISBN 9780367894795). Available at: https://www.routledge.com/Rural-Gerontology-Towards-Critical-Perspectives-on-Rural-Ageing/Skinner-Winterton-Walsh/p/book/9780367894795

   This book is first international synthesis of knowledge on rural gerontology, harnessing interdisciplinary scholarship on the rural dimensions of ageing, old age and older populations.

4. Á.Ní Léime, J.Ogg, M.Rašticová, D.Street, C.Krekula, M.Bédiová, & I.Madero-Cabib (Eds.), (2020). Extended working life policies: International gender and health perspectives (pp. 129–140). Springer. Open access at: https://link.springer.com/book/10.1007%2F978-3-030-40985-2

   This volume addresses the current debate on extended working life policy by considering the influence of gender and health on the experiences of older workers, with 25 concise and unique country reports.

5. ROSEnet (2020). Multidimensional Social Exclusion in Later life: Briefing Paper and a Roadmap for Future Collaborations in Research and Policy. In: K. Walsh and T. Scharf (series eds.), ROSEnet Briefing Paper Series: No. 6. CA 15122 Reducing Old-Age Exclusion: Collaborations in Research and Policy. ISBN: 978-1-908358-76-9. Open access at: http://rosenetcost.com/wp-content/uploads/2017/01/cost_rosenet_actionpolicy6_web.pdf

   This roadmap presents 69-specific actions with respect to: how we should measure and monitor exclusion in later life; the sort of policy we need to reduce disadvantage in older age; and the sort of research areas that need further work. This is in terms of economic, social relations, civic-rights, spatial and service exclusion.

6. Alwin DF. (2012) Integrating varieties of life course concepts. J Gerontol B Psychol Sci Soc Sci. 2012 Mar;67(2):206-20. doi: 10.1093/geronb/gbr146. Epub 2012 Mar 7. PMID: 22399576; PMCID: PMC3307990.

7. ROSEnet (2019). Seven Policy Messages on Long-term care available at: http://rosenetcost.com/wp-content/uploads/2019/10/rosenet-ltc-policy-messages-september-2019.pdf

   These messages have been developed in line with principle 18 of the European Pillar of Social Rights, which calls for access to affordable and good quality long-term care services

8. Ogg, J., Myck, M. Perek-Białas, J. (2020). Economic Exclusion in Later Life. In: K. Walsh and T. Scharf (series eds.), ROSEnet Briefing Paper Series: No. 5. CA 15122 Reducing Old-Age Exclusion: Collaborations in Research and Policy. ISBN: 978-1-908358-75-2. Available at: http://rosenetcost.com/wp-content/uploads/2017/01/cost_rosenet_actionpolicy5_web.pdf

   This briefing paper summarises current insights on economic forms of exclusion, identifying knowledge gaps, and outlining opportunities for future policy to reduce economic exclusion among older adults.

9. Ní Léime, Á, Street D., (2019) 'Extended working life in Ireland and the U.S.: gender implications for precarious and secure workers'. Ageing & Society, 39 (10), 2194-2218. Doi:10.1017/SO144686X18000508.

10. Aartsen, M., Valtorta, N., Dahlberg, L., van Regenmortel, S., Waldegrave, C. and Corrigan, T. (2018). In: K. Walsh and T. Scharf (series eds.), ROSEnet Briefing Paper Series: No. 1. CA 15122 Reducing Old-Age Exclusion: Collaborations in Research and Policy. ISBN: 978-1-908358-71-4 Available at: http://rosenetcost.com/wp-content/uploads/2017/01/cost_rosenet_actionpolicy1_web.pdf

This briefing paper summarises current insights on exclusion from social relations, identifying (some of the) knowledge gaps, and outlining opportunities for future policy to reduce exclusion from social relations among older adults.

About Irish Centre for Social Gerontology

Directed by Prof. Kieran Walsh, the Irish Centre for Social Gerontology is an internationally recognised interdisciplinary research centre on ageing, and a constituent centre of the Institute for Lifecourse and Society, at NUI Galway.

With a view to informing a holistic understanding of later life in public policy, the mission of the ICSG is to conduct research on ageing and the life course that responds to gaps in scientific knowledge, policy and practice, while promoting the diversity of ageing experiences.

The work of the ICSG is particularly focused on supporting the voice of marginalised groups of the older population, and integrating these perspectives into research and public policy design and development.