



ecee's comments on the self-regulatory initiative (SRI) for medical imaging equipment

Background

COCIR, representing the Radiological Electromedical and Healthcare IT industry in Europe, has presented a proposal for a Self Regulatory Initiative that will be discussed in the Consultation Forum 17 November 2009. The product group medical imaging equipment includes a number of so-called modalities: Computer Tomography, Ultrasound, X-Ray, Magnetic Resonance Imaging (MRI), and Nuclear Medicine. COCIR has suggested to start with ultrasound products in 2009.

ecee's Comments

Medical imaging equipment is a product group that has a small energy consumption compared to other product groups. For instance, figures in the proposed agreement show that the average annual energy consumption for new ultrasound products is about 760 kWh/year. With a total annual sales of about 20 000 units, this would amount to some 15 GWh/year on a European basis. Medical imaging equipment therefore does not represent the most important product group to be treated within the Ecodesign directive. Moreover, the primary function of these products is related to health and the products are therefore particularly sensitive to regulation that may have adverse side effects on this primary function.

General comment

- In the light of relative energy consumption and the importance to safeguard the primary function of these products, ecee welcomes the self-regulatory initiative as a good intention to contribute to energy efficient product development.
- The SRI appears to fulfil the criteria established by the Annex VIII of the Ecodesign Directive.
- Would it be possible to introduce SRI:s for the other modalities at a faster pace than the proposal suggests?

Proposal for ultrasound products

COCIR:s intention is to start with ultrasound products in 2009. Targets for this modality have been set to 6% reduction in energy consumption for new ultrasound products placed on the market between 2010 and 2012. According to the proposal, this corresponds to a reduction of 25% compared to 2005.

ecee would like to make the following specific comments:

- The target of 6% appears to be modest, but without a reference to best available technology (BAT) or a definition of an index, it is not possible to assess the

About the European Council for an Energy Efficient Economy (ecee)

ecee is a non-profit, membership-based European NGO. The goal of ecee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, ecee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of ecee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 participants from a wide range of backgrounds. ecee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.



ambition level of the proposal. The answer also depends on whether this is an average for the industry, or an average for each manufacturer.

- Further, there is no definition of the primary function to be provided by the product.
- Medical imaging equipment is often operated in a system with other standardised products, such as displays and computers. It is important that ambitious and well-defined targets be set and maintained for those standardised energy-consuming products, to ensure that all medical equipment will benefit from advances made in these areas.

Stand-by energy consumption

- eceee believes that the stand-by energy consumption of these products may be an important aspect of their total energy consumption. The possibility to reduce stand-by consumption while ensuring rapid reactivation should be investigated.

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