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Martin Eifel
DG Enterprise and Industry
European Commission

By email

08 December 2009

Dear Martin

UK comments on the proposed voluntary agreement on medical imaging equipment

The UK welcomes the industry proposals for a voluntary agreement for this sector, and agrees that a voluntary approach may be sufficient for these products given the specialised nature of the products and the limited number of manufacturers in this market. We would like the agreement to be as inclusive as possible to allow for maximum participation from companies that are not members of COCIR, so any joining fee should be proportionate and in line with the costs that members of COCIR will incur.

Unfortunately, the information provided by COCIR to the Consultation Forum is insufficient for us to take a judgement on the level of ambition of the measure. At first sight, the proposed 6% improvement for ultrasound equipment seems low, given that considerably larger improvements have been achieved in the past with no measure in place, but we await to see further information from industry before coming to a firm view on this. The criteria for voluntary agreements in the Ecodesign Directive call for 'quantified and staged objectives'. We would therefore suggest that the industry set a further tier in, say, six years including a more ambitious target.

The UK is disappointed that the industry only propose to cover one product at a time under this agreement. We accept that this is a complicated process, but in other sectors, all products covered by implementing measures are required to improve at the same time and this principle should also apply to this Agreement. The industry should therefore develop targets for improvements of the other products within the scope of the agreement as soon as possible.

Finally, we would like to see more detail in the Ageeement on how the industry intend to demonstrate that their products meet the efficiency levels being claimed. While this is a voluntary agreement, we need to be sure that mechanisms are in place to ensure that products comply with the requirements, and that there are adequate procedures to deal with manufacturers of products that do not comply.

Yours sincerely

INVESTOR IN PEOPLE
POSITIVE ABOUT DISABLED PEOPLE

Daniel Kapadia