DANISH ENERGY AGENCY

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Danish comments on the proposal for a voluntary agreement (VA) - *Self Regulatory Initiative EcoDesign of Energy using Products for Medical Imaging Equipment* dated October 19 2009

General comments
Denmark welcomes the initiative for a VA on Eco-design requirements for medical imaging equipment, and finds a VA to be suitable for this product category. However, Denmark finds the current VA proposal to be below an acceptable standard, and has the following remarks to the proposal.

Inadequate information, lack of clarity and vague targets
The proposal is vague, not well-defined, and does not include clear, measurable requirements. This is not concordant with the objectives of annex VIII of the Eco-design Directive. There is a lack of information regarding different saving-possibilities and saving-potentials. Furthermore, the proposal lacks information on how much of the potential is being realised. For these reasons it is impossible to evaluate whether or not the proposal is ambitious.

Denmark strongly suggests that a revised proposal is based on a study that contains the core elements included in the Eco-design preparatory studies, such as: product definition & standards, market analysis, technical analysis of existing products, definition of a base case/s, analysis of BAT, improvement potentials.

Scope and rate
The proposal includes ultrasound equipment alone. The remaining modalities are suggested introduced at a pace of one per year. At this rate, it will take four years to only *introduce* requirements for the whole product category of medical imaging equipment. Denmark finds this too slow and urges for the remaining studies to be conducted for all four modalities simultaneously and in the coming year.

Monitoring and compliance
The proposal lacks a clear and obligating plan for reporting, monitoring and verification. This too, is not concordant with the objectives of annex VIII of the Eco-design Directive which calls for a detailed, transparent and objective plan for control and reporting.

Further process
Due to the above described shortages in the proposal and a somewhat dissatisfactory meeting in the Consultation Forum November 17 2009, Denmark strongly urges the Commission to ask the industry for a revised proposal and to subsequently conduct an additional meeting of the Consultation Forum. If the industry is unable or unwilling to do this, the Commission should immediately initiate a process leading to a legal regulation on this product category.