

From: [REDACTED]@cocir.org>
Sent: mercredi 8 juin 2022 11:41
To: CIOBANU-DORDEA Aurel (ENV)
Cc: [REDACTED] (ENV)
Subject: COCIR - Request for a meeting to discuss how medical technology can still service EU healthcare system under the revised REACH Regulation
Attachments: Companies letter to DG ENVI on REACH revision - Final.pdf

Dear Mr Ciobanu Dordea,

I'm writing to you on behalf of COCIR, the trade association representing the main producers of medical imaging equipment such as Philips, Siemens and GE Healthcare, all with production facilities in Europe. Following a previous meeting last year with Mr Sadauskas, we would like to have a meeting with you in the course of June, if possible, with the aim of discussing developments in the EU environmental policy, and more specifically, the ongoing REACH review.

I also attach a letter to your attention, signed by some companies' executives, where they express their concerns about some aspects of the review that could have an impact on innovation for the medical imaging sector and therefore also an impact on the provision of optimal healthcare to the EU citizens. Medical imaging and radiotherapy devices are very sophisticated capital investment equipment, with an expected lifespan of 10 to 20 years. These devices utilize hazardous chemicals only when no other alternative is available to ensure equal clinical performance. As a consequence, our sector has requested derogations to the use of such substances, whether this happens under REACH or any other EU legislation.

We would also like to touch upon the criteria to define the concept of "essential uses". From recent developments, we are concerned that SoC used in medical devices might not be eligible to qualify as essential uses. This would make it impossible to ask for derogations, which would pose a huge problem not only to our sector, but most importantly to the EU healthcare system.

We would therefore appreciate an exchange with you in the coming weeks to have your views and advice on how to move forward on this topic.

We are looking forward to meeting with you at your earliest convenience.

Best regards,



[REDACTED]
Environmental, Health and Safety Affairs

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