



MITA[®]
MEDICAL IMAGING
& TECHNOLOGY ALLIANCE
A DIVISION OF **NEMA**[®]

1300 North 17th Street • Suite 900
Arlington, Virginia 22209
Tel: 703.841.3200
Fax: 703.841.3392
www.medicalimaging.org

Christopher Kent
Energy Star Product Development
Environmental Protection Agency
1310 L St NW
Washington, DC 20005

3/14/2014

Dear Mr. Kent,

The Medical Imaging & Technology Alliance (MITA), a division of the National Electrical Manufacturers Association (NEMA), is the leading organization and collective voice of medical imaging equipment, radiation therapy and radiopharmaceutical manufacturers, innovators and product developers. It represents companies whose sales comprise more than 90 percent of the global market for medical imaging technology. These technologies include:

- Medical X-ray equipment
- Computed tomography (CT) scanners
- Ultrasound
- Nuclear imaging
- Radiopharmaceuticals
- Radiation therapy equipment
- Magnetic resonance imaging (MRI)
- Imaging information systems

MITA congratulates the Environmental Protection Agency (EPA) for its long-running, successful ENERGY STAR program to reduce energy consumption and greenhouse gas emissions. ENERGY STAR has proven to be an effective tool to promote the use of energy efficient products, and we commend the Agency on its mission to seek out even further reductions.

We were, however, surprised to hear about EPA's plan to develop an ENERGY STAR specification for medical imaging equipment. In our view, ENERGY STAR will not work in our product sector because there are considerable differences between consumer goods and medical devices; medical devices are highly complex, multifunction equipment. Their energy consumption is dependent on the specified uses and cannot be simplified to non-scanning modes and summed up in a single label. This would provide only limited information to users.

Moreover, medical devices have a direct impact on human life, a fact that differentiates them from the scope of products ENERGY STAR has traditionally focused on. Seeking energy efficiencies for any medical device has the potential to negatively impact the health and safety of patients and care providers and possibly prevent new technologies that can be used to extend lives and improve the quality of life. The

COCIR Self-Regulatory Initiative, as explained later in this paper, has been developed as a tool to measure the improvements in the overall energy efficiency but not to quantify efficiency in a single index for any specific products.

Another difference with other Energy Star product sectors is that only a few models of medical imaging devices are available on the market, compared to the thousands of other sectors (personal computers, monitors, etc.). For computed tomography (CT) and magnetic resonance imaging (MRI) we can estimate between 20 to 30 models each. That means that Energy Star would only be accessible to a few models and that some manufacturers would be excluded just cause of the specific technology or design solution they adopted. For the medical sector the Energy Star is likely to hamper competition instead of enhancing it.

MITA members are committed to driving the development of new, innovative products in an environmentally conscious way. Product developers must have the freedom and flexibility they need to create the next generation of life-saving medical imaging equipment. Furthermore, manufacturers have already demonstrated their ability to determine which environmental and safety aspects are most significant and what can be done to improve these aspects across all product life stages. For example, lowering radiation dose in CT modalities is a top priority for regulators, patients and manufacturers.

By combining our industry's commitment to energy efficiency while also fully understanding the business and regulatory environment we operate in, medical imaging manufacturers have already taken important steps to effectively address energy efficiency on our own. ENERGY STAR would be an unnecessary and potentially dangerous new requirement on manufacturers that could sacrifice patient health and safety in order to achieve unrealistic energy savings that do not take into account innovative functionality.

An example of steps our industry has taken to address energy efficiency is our Self-Regulatory Initiative (SRI), created by COCIR, the European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry. COCIR is the sister association to MITA in Europe and our associations share many of the same members working in a global business environment.

In 2010, the European Commission released its regulation for EU eco-labeling. Medical imaging manufacturers came together through COCIR to work directly with the EU Commission to reach a mutual agreement to improve the environmental performance of our products. Through SRI, the medical device industry 1) developed standard methodologies for measuring MR and CT energy consumption; 2) reports figures, results, goals and achievements on an annual basis for ultrasound, MR and CT and 3) understood that optimal energy savings could not be achieved solely by manufacturers. Close collaboration was needed with users to reduce energy consumption during operation. Thus, the SRI also enables users to compare different equipment, calculate realistic running costs and save energy through proper use of our equipment

Through SRI, we found the greatest potential for energy savings lay in usage patterns, particularly in non-scanning modes. As such, medical imaging manufacturers have already begun to develop products with:

- Increased scan speed, which the lowers amount of time and energy used to conduct a patient scan
- Switch-off of modules that are not essential for the specific functioning mode.

- Low energy modes and technical solutions to help users to switch the devices to low power modes
- Information ready available on good environmental practices for saving energy
- Training programs for users

As a result of the steps we have implemented through SRI, healthcare providers should be aware of the possibility of saving between 30 and 50 percent in energy use daily with the proper use of our products. For example, 11.200 kWh of electricity can be saved on average per CT system per year, equivalent to around \$1,650, and 28.000 kWh can be saved per MRI

Any further reductions are unlikely as the COCIR studies on improvement potentials show (0% for MRI and 1,8% for CT) and could force our product developers and innovators to sacrifice patient safety for improved energy efficiency. This is why we feel very strongly that ENERGY STAR is not necessary for our sector.

While we greatly appreciate that the EPA preliminary test overview incorporated COCIR SRI, it is not necessary to duplicate a successful program that already exists. COCIR SRI continues to demonstrate good results, while also giving manufacturers the freedom they need to first and foremost protect patient health and safety.

Put simply, the benefits of providing high-quality healthcare must not overlooked to achieve energy savings and we have a system already in place that achieves both, as well as other environmental, health and safety improvements. MITA very much appreciates this opportunity to share our views with you and look forward to continuing this very important conversation soon. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Gail Rodriguez, Ph.D.
Executive Director
MEDICAL IMAGING & TECHNOLOGY ALLIANCE (MITA)
1300 North 17th Street, Suite 900
Arlington, VA 22209
703-841-3235