



**National Electrical Manufacturers
Association**

1300 North 17th Street, Suite 1847

Rosslyn, VA 22209

703-841-3200

Fax: 703-841-3300

**REGULATION OF VIDEO DISPLAY DEVICES USED IN MEDICAL PRODUCTS
NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION**

DECEMBER 2003

The National Electrical Manufacturers Association (NEMA) Imaging and Therapy Systems Division represents manufacturers of imaging and therapy systems including medical magnetic resonance imaging systems, nuclear medical imaging, radiation therapy equipment, ultrasound imaging, x-ray imaging and other medical diagnostic equipment. According to the US Department of Commerce Bureau of Census manufacturers of imaging and therapy systems shipped over \$16 billion dollars of this equipment domestically and exported another \$6.6 billion in 2001.

Use of medical diagnostic equipment and imaging and therapy systems enhances public health, saves countless number of lives each year and reduces health care costs. Video display devices are used in medical devices to display and read out critical medical data.

The electronic medical device market is fundamentally different from the household consumer market. Retailers sell tens of millions of televisions and computers annually to household consumers. Unlike consumer video display device products retailers do not sell medical diagnostic devices and imaging and therapy systems. Medical devices and systems are mostly sold directly from a manufacturer to a user and the remainder marketed through distributors. Annual electronic medical device sales are orders of magnitude less than consumer video display device products. This distribution method directly to users facilitates easy dissemination of medical device product and disposal information.

Through the consumer electronics industry, video display devices are sold to consumers who lack the ability to dispose of the product easily and appropriately. As a result, the average household may have between two and three units in storage. Because medical devices with video display devices have a limited distribution to facilities such as hospitals, and medical clinics, device manufacturers often make arrangements to recover these products when they sell the facilities a new system. Older medical devices retain substantial value and can be resold. Consequently medical device users typically do not store used medical device equipment.

There have been proposals to regulate the use and disposal of video screens. These proposals contain all or some of the following elements

1. Labeling

Medical device manufacturers would be required to put a label on a product to inform the user about proper disposal. This is not relevant to the medical device industry. Because of the cost, distribution system and size of the product, medical device companies already use different mechanisms to inform medical facilities about proper disposal. Many companies already offer take back of devices when users purchase new devices and include environmentally sound disposal information in user/information manuals.

2. Mandatory Collection and Collection Plans

For medical devices, mandatory collection and collection plans provide no added value and will require the use of limited state resources for evaluation and enforcement. The impact of mandatory collection for medical devices would add little value to the existing policy. Many medical device manufacturers already provide take-back, reuse and recycling as a regular part of their upgrade programs.

The sound environmental video display device disposal method used by the medical device industry is as follows:

- Used video display devices are sent to a processing facility that first tests the video display devices for reuse.
- Non-working or obsolete video display devices are shredded and separated into metals, glass and plastics.
- 100% of the output from the shredder is normally recycled where the glass is sent to a lead smelter; the metals are recovered; and the plastics mixed with precious metal fines and sent to a smelter. What is not metallic gets consumed for energy use.

3. Advance Disposal Fees

Advance disposal fees will not foster an increase in video display device recycling for medical devices that are already recycled through mature business programs. Such fees would be an administrative nightmare for manufacturers to manage.

Conclusion

There have been proposals in a number of states to regulate video display devices either by requiring manufacturers to submit collection plans, label devices, or report on collection, or by imposing an advance disposal fee. Whatever the merits of these proposals for consumer devices they do not apply to medical devices. Each of these proposals would add additional burden of time and cost that will only serve to increase health care costs with no environmental improvement to existing business processes. As it pertains to the healthcare industry, the cost of these proposed measures would outweigh the environmental benefit. NEMA recommends that “devices” as defined by the Federal Food and Drug Act be exempt from such requirements.