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FOR MEDTEK OG LAB

Sykehusinnkjøp HF
Att: Trude Ertresvåg

Fornebu, 26/8-21

Temporary response to the draft "Nordic Criteria for more Sustainable Packaging"

Melanor has received the consultation letter and above-mentioned draft from MedTech Europe. We thank you for the initiative and the opportunity to give our feedback. In this letter you will find our general country specific considerations for Norway. Further details and a coordinated Nordic/European response will be shared through MedTech Europe.

Melanor appreciate this Nordic initiative and supports the work to establish standards towards more sustainable packaging, but we believe it is crucial to establish this at a level that makes it sustainable also in a quality and production perspective.

Patient safety

Patient safety and meeting quality requirements along the value chain has the highest priority. This cannot be compromised by any measures.

The industry is driving and supporting processes, both on their own and in cooperation with customers, to develop sustainable solutions. Measures to obtain and drive sustainability must prove they can be combined with standards and requirements set for relevant category of medical equipment before they are introduced to the market.

The importance of making environmental sustainability measures that do not exclude products with superior quality and functionality based on intended use, life cycle cost for patients and the health care, must be kept in mind (ref. Most Economic Advantageous Tendering and MEAT methodology).

Unnecessary waste

Melanor believes greatly in cooperation between the health care and medical device industry when developing new solutions. The track record of unilaterally developed theoretical/desktop solutions and their contribution to sustainability should be evaluated. When they end up in unbalanced contract terms placing unproportionally risk on one of the parties, sustainability is not achieved. There is ongoing work to establish standards and balanced contracts terms through Standard Norway. Both the buyer and supplier side have pointed at the need to establish balanced contracts terms and are contributing to this ongoing initiative through their roles in the committee. Environmental aspects and sustainability are also within the scope and will be discussed in the context of balanced contract terms.

Medical equipment is often produced in relatively small series. Producers always consider the most effective and sustainable way to plan for the total production. As a result, this can lead to same size wrapping for different product sizes and/or variants. Adaption of wrapping to each size/variant could dramatically increase cost, pricing and be contra productive from a sustainability point of view.

Cooperation for sustainability

The responsibility of the public institutions to contribute to a more sustainable packing is crucial. Today suppliers meet specific Norwegian and regional demands for shipping of goods, packing of goods and delivery of goods. If we could change the special demands that Norwegian entities has created, the suppliers would be able to reduce the total CO_2 footprint;

- Regional specific criterion for pallet height in one of the major health regions is deviating from international standards - requires extra transportation and generates unnecessary waste due to repackaging in Norway
- Demand for paper certificates on pallets
- Slot delivery for low volume products
- Poor forecasting with no commitment to volumes
- RFI upfront of tenders is unclear – input collected from the marked seems to be unpredictable treated and randomly considered

Melanor has a strong believe in cooperation. More sustainable packaging requires efforts on both sides.

Consideration of environmental sustainably initiatives

Many producers and suppliers have over years strived to reduce environmental footprint, and simultaneously made sure health care providers have the best possible medical equipment at hand. They have contributed to a cost-effective and clinically proven treatments, balanced with environmental considerations. There are solid strategic plans to further improve among our members. Achievements and future improvements should be considered and rewarded when procuring.

More effort could be allocated to value-based procurement (e.g., MEAT model) to incorporate and reward a broader social responsibility and speed up the process to increased sustainability.

Country/regional specific requirements

The medical device industry is global. Country specific requirements when tendering within a limited and specific market as medical equipment, must be avoided. When working to establish standards it is therefore important to have in mind that the medical device industry is global. We recommend aiming at criteria and certificates at least at a European level.

Companies producing medical equipment are highly specialized to meet all requirements set to produce and follow up on patient safety and safe usage of their products. Larger production series lay the ground for more effective production and low market cost. Smaller series adapted to specific country requirements will increase cost and potentially prevent global actors to participate in tenders. Another risk is that products needed to support best possible treatment would not be made available in markets with specific regional criteria deviating from major market needs.

Environmental criteria

Environmental stamps/proof to be used when procuring medical equipment must be “type 1” labeling (independent 3rd party to approve and control that those requirements are met) and must be acknowledged

at least at a European level. E.g., EU Ecolabel will be OK, but Svanemerket (The Swan) is not established as a global nor European standard and will reduce the number of companies being able to participate in tenders.

CE-approval

Today, there are standards trough ISO and legislation that sets criteria to be fulfilled on packaging for medical equipment. Packaging and documentation in relation to sterility are key elements in the CE-approval of medical equipment (ref. also MDR/IVDR). Criteria for sustainable packaging must be aligned with relevant standards and legislation if products should still be available under the existing CE-approval. Changing packaging will thus be a long and extensive process. Please see the official response from MedTech Europe for further details.

Final remarks

Melanor appreciates the initiative and will encourage our members to contribute and support further development against more sustainable packaging, given that our general remarks mentioned in this letter and the coming final response from MedTech Europe are considered.

Best regards
Melanor – Bransjeorganisasjonen for medtek og lab

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