Europaudvalget 2011 KOM (2011) 0348 Bilag 2 Offentligt



Radiograf Rådet H. C. Ørsteds Vej 70, 2. tv. 1879 Frederiksberg C

Kontakt: Telefon: +45 3537 4339 Fax: +45 3537 4342 kontakt@radiograf.dk www.radiograf.dk

Åbningstider: Mandag - torsdag 09.00-14.30 Fredag 09.00-13.00

Dear Minister of Health, Minister for European Affairs, and Minister of Employment

Request for Denmark's support to remove threat to MRI from EU health and safety legislation (EMF Directive 2004/40/EC): Priority issue for Patients

Radiograf Rådet, represents approximately 500 MR workers, is seriously concerned that European health and safety legislation on electromagnetic fields (EMF Directive 2004/40/EC¹) will continue to impede the use of MRI unless a derogation is agreed.

Due to concerns raised by patient groups, scientists and the medical community, the European Commission, on the basis of sound scientific evidence, has proposed a derogation for MRI from the exposure limits set in the Directive.

We are bringing this to your attention, as Ministers responsible for health and safety are currently considering rejecting the European Commission's proposed derogation. Whilst we understand that the Minister for Social Affairs' priority is to ensure the highest level of worker safety, there is a very worrying lack of consideration for the potential impact of their decision on the use of MRI which is a vital life-saving technology.

The situation is now critical as discussions are on-going in the Council in Brussels and we urge you to intervene on this issue before a decision is made which will have a seriously detrimental impact on the welfare of patients and on the ability of the public health system to deliver.

A derogation for MRI is vital for the following reasons:

- MRI has been used for over 25 years, imaging up to 500 million patients without evidence of harm to workers due to EMF exposure
- MRI examinations are undertaken in highly controlled environments and there are stringent safety standards to ensure the safety of patients and workers
- MRI is free from health risks associated with ionising radiation such as X-rays, which would form the alternative to MRI in many situations.
- Our radiographer members operate MRI scanners in their daily professional activities and are unanimous in supporting the derogation for MRI, as they do not experience any health effects

¹ Directive 2004/40/EC on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (electromagnetic fields)

and as adequate safety standards are already in place to ensure utmost safety of workers and patients alike. Radiographers are professionals who have the highest competency and responsibility in maintaining safety measures for patients and professionals in all imaging modalities using ionizing radiation and electromagnetic fields.

This is now in jeopardy and we therefore request:

- That it is made clear to the Ministry of Social Affairs the importance of securing a derogation for MRI for public health reasons
- A clarification from you on Denmark's position on this issue.

We look forward to taking hearing from you and resolving this issue satisfactorily at your earliest convenience.

Best regards

Charletter Grauppard

Charlotte Graungaard President, Radiograf Rådet

Encl:

- EFRS Position Paper
- Alliance for MRI Position Paper

Copies sent to: Ministry of Health Ministry for European Affairs Ministry of Employment Committee of Health Committee for European Affairs Committee of Employment