Member Interview: Riccardo Corridori of COCIR

Brussels, 21st September 2017: David Fitzsimons met with Riccardo Corridori, Environmental, Health and Safety Affairs Senior Manager at COCIR, to talk about the medical devices sector and the work priorities for the European Remanufacturing Council.

RC: That’s easy! There is strong demand for remanufactured and refurbished medical devices around the world. But too often the legal framework promotes the linear economy and undermines opportunities to use our member’s equipment. For example, the recent changes to RoHS (2014) have been unhelpful for the business of refurbished medical imaging devices and have been responsible for causing a sharp fall in annual growth. We think that many other product sectors have a shared interest in highlighting the lost opportunities for the circular economy when regulations are redrafted. Together, we will be stronger.

DF: Thank you for your support. Regarding RoHS, unintended consequences are a common feature of regulation. In India in the nineteenth century, a British Governor resolved to reduce the number of cobra snakes by offering a financial reward to anyone presenting one – dead or alive. While it made sense on paper, this strategy...
Interview with COCIR, Member of the Conseil Européen de Remanufacture

actually resulted in more snakes because local people started to breed cobras in order to claim the reward. RoHS is in place to protect consumers, so I doubt that anyone involved in the redrafting of these regulations attached any importance to the unintended consequences.

What should the Council prioritise over the next two years?

RC: The free transboundary movement of used devices to be refurbished / remanufactured is a key element of a circular economy business model. The EU is negotiating trade deals with India, Brazil, China and Japan, having just completed one with Canada. Although Circular Economy issues are raised in these negotiations, this is an opportunity to make certain that restrictions on the sale and movement of used and remanufactured products are removed. Working with DG TRADE could bring significant benefits to the sector.

DF: Five years ago, US Trade Officials included remanufacturing in their trade discussions with the Philippines so as to avoid restrictions on the movement of “cores”. If remanufacturing is to become a more normal part of a product life cycle, we do need to remove barriers to international trade in these products.

Do you use the term “remanufactured” or “refurbished” in your sector?

RC: In some languages, it is the same word! We use “refurbished” as the term “remanufactured” could have different regulatory implications for medical devices. A classic example is provided by the US. There, a FDA regulation defined “remanufactured medical devices”, which is the same as the EU definition of “fully refurbished” devices. By using the term “refurbished” we ensure a common understanding on regulatory implications in both the EU and the US.

DF: And in the aviation sector where remanufacturing is a normal part of planned maintenance and where the very highest standards are maintained, the word ‘remanufactured’ is rarely used. The Council aims to represent the interests of all those that refurbish and manufacture – as long as they use the highest standards.

Besides trade agreements, where do you see an opportunity to promote remanufacturing in Europe?

RC: Many trade associations in Brussels are jointly pushing for a new ambitious European Industrial Strategy. Remanufacturing should appear in this if we are to see the activity grow from €30 billion to €100 billion.

DF: Thanks Riccardo. We will follow up on your suggestions and share this interview with the members. Now is your opportunity to meet our mascot, Rodney Copperbottom. He doesn’t say much but I can promise you that he listens very carefully.

For further information about the work of COCIR visit www.cocir.org
The CER (Conseil Européen de Remanufacture) is managed by Oakdene Hollins

Disclaimer:
This disclaimer, together with any limitations specified in the report, applies to use of this report. Oakdene Hollins accepts no responsibility for its use by other persons. This material is copyrighted. You can copy it free of charge as long as the material is accurate and not used in a misleading context. You must identify the source of the material and acknowledge our copyright. You must not use material to endorse or suggest we have endorsed a commercial product or service.

This report does not constitute legal advice.