

February 22, 2022

The Association of Medical Device Reprocessors (AMDR) represents the interests of commercial, regulated medical device reprocessors/remanufacturers. Reprocessing is a circular solution for healthcare that helps to build supply chain resilience by reducing consumption of new medical devices, saving costs, and cutting waste and emissions. Our industry employs over 2,100 workers, mainly in the United States.

In considering the RFI, our thoughts fall into three areas:

- 1) **REMADE's focus should be prioritized by sector of the economy that contribute most to the climate change problem, not by products or materials that members currently remanufacture.** In our view, this is the way the world is looking at the problem of emissions and the way our industries are most likely to secure research funding, visibility, and build allies/partners.

We note, for example, that the health sector drives 5% of greenhouse gas emissions globally (8% in the US) and therefore contributes double to triple the emissions of the aviation sector. REMADE should frame its interests through the lens of addressing climate change, targeting highly problematic sectors first regardless of material that *could* be remanufactured.

The attached backgrounder offers a more detailed look at greenhouse gas emissions in the health sector, specifically from Scope 3 causes (largely the supply chain), which accounts for over 80% of the health sector's emissions. We would like to see REMADE organized to address high priority sectors given global emissions data by sector. A helpful reference is [available](#) with pre-pandemic published data on the breakdown of greenhouse gas emissions by sector. The pre-pandemic data are more likely accurate for future use than recent data reflecting the down economy during COVID-19.

- 2) **REMADE should be singularly focused on driving a policy agenda at the federal level that elevates discussion around these prioritized sectors.** World leaders are desperately looking for solutions to address climate change. REMADE represents existing solutions and should have a seat at the table for the discussions already taking place at federal agencies.

In the health sector, for example, the U.S. Department of Health and Human Services under the Biden administration has created the [Office of Climate Change and Health Equity](#). REMADE should already be in discussions to educate policy makers on the role that remanufacturing (known as reprocessing in this sector) could play if fully used by healthcare consumers (hospitals). This would expand jobs, strengthen the supply chain, and lower costs.

This should be repeated with each agency to accelerate the rate with which remanufacturing reduces greenhouse gas emissions across high priority sectors.

- 3) **REMADE should advocate or fund Life Cycle Assessments of healthcare products to expand the base of evidence showing the dramatic environmental benefits of reprocessing or remanufacturing.** Again, this should be prioritized in rank order of carbon emitting sectors.

An additional area we would like to see addressed is support from REMADE to members on how to address end of life for products once their remanufactured life ends – again through the lens of reducing climate changing emissions.

We would like to see REMAN Institute play a more visible, leading role on right to repair issues, particularly across the prioritized economic sectors that cause the most greenhouse gas emissions.

Finally, we think REMAN could strengthen its messaging and execute a more aggressive strategic communications program that would communicate these priorities and elevate the visibility of all remanufacturers as vital for addressing climate change challenges. This should include messaging around strengthening the supply chain by keeping products in domestic circulation. Covid-19 exposed the vulnerabilities of the global supply chain and we have a domestic solution (reprocessing) that can help to build supply chain resiliency. REMAN leadership should be the “go to” for media interviews on these topics.

We hope this helps REMADE with its roadmap and prioritization efforts. We are always available to discuss these views with you. We have also attached our policy position document and a recent memo we sent to the EU Commission outlining our right to repair concerns.

Kind Regards,

A handwritten signature in black ink, appearing to read 'D Vukelich', with a stylized flourish at the end.

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