



**ENVIRONMENTAL and HEALTH NGOs' KEY DEMANDS on
MEASUREMENT & CONTROL EQUIPMENT CONTAINING MERCURY
in view of a COUNCIL Political Agreement**

1 December 2006

Dear Minister,

With this letter weⁱ would like underline the significance of a strong Political Agreement in Council on the EC proposed directive on measuring and control equipment containing mercury, which we understand will be discussed in December.

As you are aware, mercury is an extremely dangerous toxin that is already widespread in our environment, posing a serious danger to the health of current and future generations. The health hazard comes from the *entire* lifecycle of all mercury uses, so *all measures* that reduce mercury use and spillage into our environment protect people's health and make European healthcare safer.

We, the environmental and health NGOs, call on you to consider our key demands during your Council discussions:

- 1. Restrictions should be placed on the marketing and use of mercury in all measuring and control equipment for consumer and professional use, only allowing time-limited exemptions where safer alternatives are not yet available.** The use and marketing of new mercury-containing fever thermometers and sphygmomanometers (excepting strain gauges for healthcare), for both consumer and professional use, should be banned and not qualify for exemptions. Mercury containing manometers, barometers, and other thermometers etc. for the general public should be banned and not qualify for exemptions. For any other measuring and control equipment not intended for the general public, a transitional period of maximum 2 years should be instituted prior to the ban. Derogations may be given for a limited period of time, to be set on a case-by-case basis, if manufacturers can prove that they have undertaken every effort to develop safer alternative equipment, and these are still not available.

Justification:

- Mercury-free alternatives are available and Scandinavian countries readily use them. Specifically with medical equipment, no risks to patients were observed from their use.
- All mercury containing devices pose a risk to human health and the environment during use and after disposal, because they can release mercury into the environment.
- Substituting mercury is the only effective way of stopping an almost inevitable release of mercury.
- For both consumer and professional uses, many of these devices have already been extensively analysed; non-mercury alternatives are commercially available; and costs are comparable.

2. Mercury containing sphygmomanometers for both public and healthcare uses should not be permitted. Exemptions are unnecessary, as many suitable alternatives already exist.

Justification:

- Sphygmomanometers are used widely in hospitals, in private medical practices, etc. Of all mercury instrumentation used in health care, sphygmomanometers represent one of the largest mass of mercury per device (approximately 100 g/unit), posing a commensurate risk.
- Their widespread use collectively makes them one of the largest mercury reservoirs in the health care setting, and therefore a significant danger.
- Mercury-free sphygmomanometers can greatly reduce the risk of mercury exposure to patients, staff, and the environment. When properly calibrated, they are as accurate - if not more so - than the older mercury models.
- Mercury-free sphygmomanometers do not cause problems in clinical diagnosis and monitoring of difficult cases, including arrhythmias, preeclampsia and accelerated hypertension.ⁱⁱ In Sweden, Denmark, Austria and the Netherlands, only positive experiences from the use of mercury-free devices have been reported.
- There are many mercury-free sphygmomanometers on the European market from major medical equipment suppliers, (9 brands identified to date). Many of them satisfy the criteria of professional organisations such as the British Hypertension Society, the European Hypertension Society, and the Association for the Advancement of Medical Instrumentation.
- The Commission avoided conducting a proper risk analysis of mercury free sphygmomanometers. Such analysis would have shown the advantages of the alternatives.

3. Manufacturing new barometers which contain mercury is irresponsible.

- The maintenance of existing barometers for historical collections, museums and heritage purposes is understandable, but manufacturing NEW barometers which contain mercury following traditional designs is irresponsible. Carefully controlled and licensed manufacturing does NOT guarantee that these instruments will never leak or break after they leave the manufacturers' floor.
- Barometers use large quantities of mercury (around 999 g more than a fever thermometer). Any barometer breakage poses an enormous risk of contamination and severe health effects, not to mention significant clean up costs.
- Mercury free barometers, both aneroid and digital, are already available in the market, and can be transported without the need for hazardous packaging. (see Annex)
- Although very few manufacturers exist in Europe, the manufacture, repair and restoration of mercury barometers is NOT their only business. These companies usually also manufacture different types of aneroid (mercury-free) barometers, different clocks, barographs, marine instruments, thermometers, hygrometers, etc.¹ Therefore their business is NOT likely to collapse when mercury use is banned.
- Furthermore, a ban on new mercury barometers will increase the value of the existing ones, and the related income for those selling and maintaining them.

¹ <http://www.barometerworld.co.uk/default.htm> (UK), <http://www.comitti.com/> (UK), <http://www.russell-scientific.co.uk/> (UK), <http://www.barometers.com/index.htm> (Belgium), <http://www.rosebarometers.nl>

The World Health Organisation has concluded that there is **no safe level of mercury exposure**. We need to address all sources in order to safeguard people's health.

Thank you in advance for your interest and support,

Yours sincerely,



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Cc: Environment Delegates, Brussels (email) and
the Members of the Council Working Group on Harmonisation – Hazardous Substances (email)

Annex:

Different types of barometersⁱⁱⁱ



Mercury barometer
Open face mahogany
stick barometer
(910mm (36") x 120mm (5"))



Mercury-free barometer
200mm (8") diameter dial barometer
(300mm (12") overall diameter)



Mercury-free barometer
Hanging Precision Aneroid Barometer
(130mm (6") diameter)



Barometer silver
electronic^{iv}



Mercury-free Barometer
200mm (8") dial banjo barometer
with aneroid movement and inlays
(960mm (38") x 250mm (10"))

ⁱEnvironmental NGOS include

The **European Environmental Bureau (EEB)**, www.eeb.org, is a federation of more than 140 environmental citizens' organisations based in all EU Member States and most Accession Countries, as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The aim of the EEB is to protect and improve the environment of Europe and to enable the citizens of Europe to play their part in achieving that goal.

Health and Environment Alliance (HEAL), <http://www.env-health.org/> is an international non-governmental organisation advocating environmental protection as a means to improving health and well-being. Member groups and organisations represent health, environment, women, health professionals and others. The group has a diverse membership of 41 member groups (6 international organisations, 11 European networks and 24 national/local organizations) including non-governmental organisations, professional bodies representative of doctors, nurses and other healthcare workers, academic institutions and other not-for-profit organisations.

Health Care Without Harm Europe (HCWH), www.noharm.org, is an international coalition of hospitals and health care systems, medical and nursing professionals, community groups, health-affected constituencies, labour unions, environmental and religious organisations. HCWH is dedicated to transforming the health care industry worldwide, without compromising patient safety or care, so that it is ecologically sustainable and no longer a source of harm to public health and the environment.

The **Zero Mercury Working Group**, www.zeromercury.org, is an international coalition of more than 40 public interest non-governmental organizations from around the world formed in 2005 by the European Environmental Bureau and the Mercury Policy Project/Ban Mercury Working Group. The aim of the group is to reach "Zero" emissions, demand and supply of mercury, from all sources we can control, towards eliminating mercury in the environment at EU level and globally."

And with the support of NGOs from the USA (Natural Resources Defence Council), India (Toxics Link), China (Global Village of Beijing), Brazil (Association for Combats against the POPS), groundWork (South Africa)

ⁱⁱ KEMI – Swedish Chemical Inspectorate (2005b) Mercury-free blood pressure measurement equipment – Experiences in the Swedish healthcare sector. Sundbyberg. November 2005, p. 4.

ⁱⁱⁱ All pictures of mercury and aneroid barometers are from <http://www.russell-scientific.co.uk/>

^{iv} Picture from <http://www.barometers.com/products1.php?product=electronic>