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Député de Meurthe et Moselle

Maire de Lunéville

Tuesday, October 6th, 2015

Dear Sir,

As Member of the French Parliament, I wish to participate in the consultation on the stakes relative to the extension of the exemption from the RoHS Directive for electric and electronic articles made with "Pb bound in crystal".

Firstly, I would like to recall that the European Directive RoHS (2002/95/EC) complements the Waste Directive 2008/98/EC and aims at restricting the use of six hazardous substances (mercury, cadmium, hexavalent chromium, lead, polybromobiphenyls, polybromodiphenylethers).

The aim is to avoid the discard of dangerous substances to the environment.

Crystal, of which Pb is one constituent, falls in the scope of the RoHS Directive. Used in electric applications (notably luminaires and suspensions), it benefits from an exemption delivered in 2008. The issue is to renew this exemption.

Here are my arguments in favour of the renewal of the exemption.

1. Is it possible to produce crystal without Pb ?

Lead is used in the manufacture of crystal because it brings the following properties

For consumers	For crystal manufacturers
<ul style="list-style-type: none"> - Better optical properties - Energy savings - Beauty of the artefacts : Chandeliers, floor lamps, candelabras, table lamps, wall sconces, luminaires, clocks etc. <p>The refraction index of crystal items generates a light transmission bigger than the one generated by flint glass (by a factor of at least 10%) i.e. the "rainbow effect"</p>	<ul style="list-style-type: none"> - Lower melting point of crystal allows for <ul style="list-style-type: none"> • A longer handcraft working time on the material, enabling forms which could otherwise not be possible to produce

So far, there exists no substitute to the production of crystal. Thorough research over the latest 20 years did not lead to the discovery of substances delivering equivalent properties (brightness, hot malleability). Lead oxide remains the essential constituent allowing to

distinguish flint glass from crystal. Moreover, the industrial use of lead oxide is heavily regulated, protecting both workers' health and the environment.

It is therefore impossible to substitute lead oxide in crystal

2. What kind of risk is generated by electric applications made of crystal ?

Electric equipment containing crystal are produced in extremely small quantities, compared with the millions of electric/electronic equipment, by a report of 1/100,000.

Basically, no electric crystal applications are discarded because they are precious and even object of prestigious collections.

Should these applications be broken, as Pb is bound in the crystal glass matrix, the vitrification process is so stable that **the Pb migration towards the environment would be negligible.**

3. What are the risks for Industry ?

To ban the use of lead oxide in crystal would lead to the disappearance of one third of world known and famous crystal manufacturers. In other words, this would mean their disappearance.

To kill a trust of excellence in order to limit a risk which all demonstrates that it is largely inexistent would be disproportionate and unreasonable.

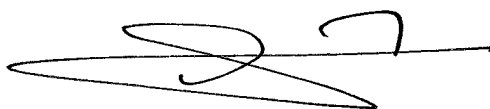
4. What would be the economic consequences ?

Crystal business generates about 1,600 direct jobs in France and about 6,000 in Europe. The region of Lorraine would be particularly affected as crystal contributes to its brand. Indeed, crystal plants are located on ancient sites far from the big work areas (particularly Lorraine) and therefore uniquely enable economic activities in these areas. For instance, a city such as Baccarat (5,000 inhabitants) lives only because and for crystal (700 jobs).

To conclude, crystal specific properties, the absence of alternatives to Pb in terms of optical properties, energy consumption, aesthetic quality, together with the ancient and artistic character of this activity, its local economic importance and the almost inexistent risk of Pb pollution stemming from crystal are the reasons for which **I support the request submitted by the concerned companies in view of the 10-years renewal of the exemption currently enjoyed by crystal manufacturers.**

I thank you in advance for the kind attention to these elements.

Yours Sincerely,



Jacques LAMBLIN