



Oeko-Institut e.V. - Institute for Applied Ecology

SUSTAINABLE PRODUCTS ET MATERIAL FLOWS
DIVISION
Mezhauser Str. 173
791 00 Freiburg
Germany
e-mail

Prague, 16th October 2015

Subject: Application to exempt of lead crystal glass according to the Directive 2011/65/EU
(RoHS 2)

Dear Sirs,

The Association of the Glass and Ceramic Industry of the Czech Republic is an interest group of producers of flat, container, technical and utility glass, glass and mineral fibres, household china, household ceramics and sanitary ware, trade companies, suppliers of machinery, machine and technological equipments and services, and specialized schools.

The Association defends the interests of glass producers and supports their effort in the area of their development. All is in agreement with demands of a long-term sustainable development of this branch. Therefore, we turn to you with a request concerning an exemption for crystal glass producers.

On January 16, 2015, the EDG association (European Domestic Glass) submitted a renewal request for exemption issued for 5 years from June 2011, concerning crystal glass used for electric and electronic equipment. The Association supports granting of this exemption. This branch of the glass industry could be seriously damaged or even disappear, if the European Union does not grant an exemption to the use of lead bound in crystal glass for luminaires and other electric appliances (chandeliers, lamps, clocks, digital photo frames, illuminated bricks, etc.).

We turn to you with the request to leave this exemption also for future period. The current exemption runs until July 2016. The Association fully agrees with the European Commission and is aware of the need to introduce hygienic measures leading to an improvement of public health according to the rules of REACH (Registration Evaluation Authorization and Restriction of Chemicals) and the RoHS Directive (Restriction of Hazardous Substances).

Nevertheless, it is necessary to use these rules wisely. The use of crystal glass as a part of electric and electronic equipment is not dangerous. In spite of an effort to find any alternative



solution, there is no substitute for lead oxide in the field of crystal production. It is also important to mention that very few crystal products are thrown away. These products are considered as luxury goods.

We are proud to say, that the production of crystal glass is a traditional branch with many centuries tradition in the Czech Republic and local companies belong to the foremost world producers. At the same time, it is necessary to point out that in the Czech glass industry more than 18,500 workers is employed, from which more than 10,000 workers in utility and other glass and the rest in further branches and services. It is also important to mention that location of the glass industry is mostly in regions with higher unemployment. Just people create the economic activities in these regions and they are supporters of cultural heritage.

If the European rule is applied with excessive rigour, i.e. without the exemption for lead in glass, the producers in the Czech Republic and Europe will face deep troubles being for a number of them closing-down. In these consequences, a lot of workplaces and also social, economical and cultural contribution of producers for their regions, are endangered.

It is necessary to warn that:

- No acceptable substitute of lead in chemical composition of crystal glass at contemporary preserving given specific properties exists.
- The use of crystal glass has no influence to health according to current standards.
- There is no danger to the environment according to current standards.
- High risk of working places loss in regions with high rate of unemployment.
- Danger of extinction of traditional producers and moving of production out of the European Union.

With regard to the above mentioned reasons, the Association fully supports the request of producers that wish to obtain exemption for ten and more years.

Dear Sirs, I hope that you will support this exemption for next years.

Yours faithfully,



Mr. Petr Mazzolini

President of the Association of the Glass and
Ceramic Industry of the Czech Republic