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Yzeure, 13<sup>th</sup> october 2015

Dear Sir,

The crystal industry could be severely damaged should the exemption 29 not be granted for a new period. As Head of the design, glass and industry Department at the National School of Glass, I fully support the exemption.

Lead oxide really makes the difference between simple glass and crystal. The crystal is manufactured by adding lead oxide to the glass. That addition influences the specific properties of crystal : malleability, working time and viscosity. Those properties are necessary for obtaining items of technical precision and are absolutely necessary to the creation of luminaires and other electric applications impossible to make in simple glass. The crystal has optical properties values defying all comparison with glass. Articles made with crystal belongs therefore into the category of art, exceptional, luxury works of art .

Besides, most of the items manufactured in crystal are unique. Each of them is a creation or issued in a limited edition. There is no mass production. For horology, production is about hundreds per year per producer, for electric chandeliers, total production volume is a little more than a thousand per year in Europe. Landfilling of those prestigious items is highly unlikely : they are kept, transferred, inherited or resold. In France, there are many second-hand shops and specialized repair workshops, privately collecting, repairing and replacing spare parts of crystal glass electric applications.



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It also should be taken into account that the applicants have produced the results of leaching tests. Those tests demonstrate that crystal is classified as non-hazardous waste according to criteria from Council Decision 2003/33/EC, including in relation to lead leaching.

Stopping the use of lead oxide would thus have no positive effect on the consumer (which is not exposed) or the environment (compliance with non-hazardous waste criteria).

For all these reasons, as a teacher, in the name of a prestigious industry and of my students which are very involved in preserving our heritage, I would be very grateful if you could support the exemption of crystal.

Emmanuel VIGNAUD  
Head of department  
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